Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)		
Cross-Ownership of Broadca Stations and Newspapers	ast))	MM Docket No. 03	l-235
Newspaper/Radio Cross-Ow Waiver Policy	vnership))	MM Docket No. 96	5-197

COMMENTS OF THE NEW YORK TIMES COMPANY

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December 3, 2001

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SUMMARY

The New York Times Company ("The Times") supports full repeal the newspaper/broadcast cross-ownership rule for all but the most highly concentrated markets. By focusing on The Times's own experience as a long-term owner of both newspapers and broadcast stations, these comments demonstrate that repeal of the rule would serve the public interest.

We show (a) that the newspaper/broadcast rule no longer serves any legitimate purpose in today's media-saturated environment, (b) that repeal of the rule will result in an increase, not a decrease, in diverse and competitive sources of news and information available to the public and (c) that because newspapers and television stations do not compete substantially for the same advertising dollars, elimination of the rule would not materially reduce competition in advertising markets.

In Part I, we examine the plethora of separately owned media voices in each of the markets in which The Times owns radio or television stations. We show that even in the smallest Times television market, Fort Smith, Arkansas, the 107th ranked DMA, newspaper readers, television viewers, cable and satellite subscribers, radio listeners and Internet users now have access to a striking multiplicity of independent voices. Given this great diversity, there is no longer any valid rationale for retaining a government-imposed limit on common ownership of newspapers and broadcast stations at the local level.

Part II of these comments describes the experience of The Times in achieving the benefits of local cross ownership in two special circumstances --(1) in its operation of a grandfathered radio/newspaper cross-ownership combination in New York and (2) in the operation of a 24-hour cable news channel by a Times newspaper in Sarasota under conditions that are closely analogous to those of newspaper/television cross-ownership. In each case, the common operation has permitted the local Times entities to provide a much improved news and information service for their communities. We show further that while some similar benefits may be achieved through cooperative operating arrangements that do not involve common ownership, there are serious inherent limitations to such partnerships with third parties. These limitations include (1) the time-limited nature of such arrangements, which inhibits significant investment and long-term planning, (2) the inability to obtain full-market coverage in most cable news channel arrangements, (3) electronic incompatibilities between businesses that have invested in different technologies, and (4) inevitable conflicts between the unique cultures and internal standards of different business entities, particularly in the news business.

Repeal of the cross-ownership rule would eliminate these obstacles.

Repeal would permit newspaper/broadcast entities to use combined resources to provide more news and information services, to do so at a higher level of quality than at present, and to create new services such as all-news DTV channels. In a time when steadily increasing audience fragmentation and the

elimination of network compensation has produced consequent great pressure on local station news budgets, the ability to use combined resources is particularly important. Finally, but by no means least, repeal of the rule in all but the most highly concentrated markets is required to permit newspaper/broadcast combinations with strong local news commitments to compete effectively on the local level with outlets owned by increasingly concentrated and dominant national media companies.

Part III of these comments shows that advertisers purchase print and television advertising to reach somewhat different target audiences, to present different types of messages (e.g., images, motion and feeling on television and greater detail about products and services in newspapers), and to reach different geographic areas. For these reasons, larger advertisers have separate budgets for newspapers and for television and such advertisers buy advertising in each medium to serve complementary purposes. A combined newspaper and television operation would thus permit advertisers to achieve different objectives more efficiently through a single advertising buy, but would not materially impact competition for advertising dollars between the two media.

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COMMENTS OF THE NEW YORK TIMES COMPANY

The New York Times Company ("The Times"), by its attorneys, hereby files its comments in response to the "Order and Notice of Proposed Rule Making" released September 20, 2001 in the above-captioned proceeding.

The Times is a member of the Newspaper Association of America ("NAA"), which is filing extensive comments today urging repeal of the newspaper/broadcast cross-ownership rules. The Times fully supports the NAA's position. These separate comments are with respect to The Times's own experience as the operator of both broadcast stations and newspapers. Our comments focus on the extent of media competition in the markets in which The Times operates television stations, the public interest benefits The Times believes it will be able to achieve upon elimination of the cross-ownership rules, and on the complementary nature of television and newspaper advertising.

I. There Are Abundant Media Voices Available in Every Market In Which The Times Operates Broadcast Stations.

The Times is the publisher of <u>The New York Times</u> in New York City, the <u>Boston Globe</u> in Boston, and 15 daily newspapers in Florida, Massachusetts, Alabama, Louisiana, North Carolina, South Carolina, Georgia and California. In New York City, The Times has owned WQEW(AM) and WQXR-FM since 1944. The ownership of those stations has accordingly been "grandfathered" under the current cross-ownership rules. The Times also owns eight television stations, which are located in Memphis, Tennessee; Norfolk, Virginia; Scranton, Pennsylvania; Huntsville, Alabama; Des Moines, Iowa; Oklahoma City, Oklahoma; Moline, Illinois; and Fort Smith, Arkansas.

In each of the markets in which The Times operates a broadcast station, there is a plethora of competing local media voices. The extraordinary number and diversity of separately owned media outlets in New York City, where The Times owns radio stations, has recently been chronicled by the Commission itself in its decision concerning the Fox/Chris-Craft merger. Each of the markets in which The Times operates television stations also contains a substantial number of separately owned television stations, radio stations and newspapers, as well as cable systems and direct-to-home satellite services that

¹ The Commission's opinion in that case noted that, following the Fox/Chris Craft merger, the New York DMA would "still have at least 19 independent television voices," that more than "120 commercial and noncommercial radio stations are licensed to communities within the New York DMA," with over 65 independently owned and operated radio station groups," that New York's cable penetration rate is 74%, with at least 8 independent cable operators providing service to the market," and that 25 daily newspapers are published in the DMA, as well as hundreds of local weeklies." <u>UTV of San Francisco</u>, Inc., 24 CR 288, 299 (2001).

offer their subscribers multiple video channels-- almost always as many as 36 channels and frequently 100 or more channels - - none of which is owned or controlled by The Times.

This media abundance exists in The Times television markets even though none of the markets is ranked higher than 40 in Nielsen's listing of television Designated Market Areas ("DMA's"). Attachment 1 hereto shows the extent of media diversity in each of The Times television markets. For each market, Attachment 1 shows (1) the number of television stations in the DMA, (2) the different owners of television stations in the DMA, (3) the number of radio stations in the DMA, (4) the different owners of radio stations that are not also owners of a television station in the DMA, (5) the DMA household cable penetration percentage, (6) the satellite subscriber penetration percentage in the state or states served by the television station,² (7) the daily newspapers published in communities within the DMA and (8) the weekly newspapers published in the DMA. Although it is impossible to quantify on a market-bymarket basis the myriad sources of news and information available on the Internet in every television market, Attachment 2 hereto includes two illustrative listings of some of the hundreds of links to such English-language sources.3

² DMA satellite penetration figures are not readily available, although state-by-state penetration figures are available. The satellite penetration figures by state include subscribers to DirecTV, EchoStar and C band services.

³ Recent published figures on Internet usage as of October 2001 show that 62% of U.S. television homes are now online and that work and home Internet usage per user has now reached approximately 19 hours per month. Source: Data released November 13, 2001 by Nielsen/Net Ratings, www.nielsen-ratings.com.

The diversity of media voices available in even the smallest of The Times television markets is striking. In the Fort Smith, Arkansas DMA, currently ranked as the 107th market, there are presently seven full-service television stations owned by five different owners, 52 radio stations and radio construction permits owned by more than 20 different owners (not including any owner that also owns television in the market), six daily newspapers owned by three different owners in different communities throughout the DMA, and 14 weekly newspapers. There are also many low power (LPTV) television stations that originate their own programming. Two such LPTV stations in Fort Smith operate as the local network outlets for UPN and Fox and are widely carried on local cable systems.

Cable penetration in the Fort Smith DMA is 64%. In the state of Arkansas, 31.55% of households subscribe to satellite programming services.⁴ According to a recent trade publication,⁵ the major cable systems serving Fort Smith and Fayetteville list more than 60 available channels at each location, including C-SPAN, CNN, CNBC, CNN Headline News, Fox News Channel and MSNBC. Subscribers to satellite services in the Fort Smith DMA may choose among service packages offering more than 100 video channels, including all of the news service channels listed above.

⁴ Some satellite subscribers also subscribe to cable so as to receive local stations, but the extent of such dual subscribership is not known.

⁵ Television and Cable Factbook 2001, Cable Volume 1, at p. D-85.

Residents of the Fort Smith ADI who are online also have access to myriad Internet sources of news and information. Three of the local television broadcasters have substantive news websites, as do a number of local newspapers, local governmental organizations, all of the cable news channels noted above, all of the national television networks, and a large number of major newspapers, wire service news organizations and news magazines in the United States and throughout the world. See Attachment 2. All of this media diversity exists for persons who live in a small television market. As shown in Attachment 1, the media diversity in the other Times television markets is even greater.

Notwithstanding this media diversity, the present newspaper/broadcast cross-ownership rule prevents The Times from acquiring (other than temporarily) any daily newspaper within the Grade A contours of its television stations or from acquiring any television station placing a Grade A contour over any community in which a Times-owned newspaper exists. In the Des Moines market, for example, the rule prohibits The Times from owning a newspaper not only in Des Moines itself, but in any of a number of outlying communities in which newspapers ordinarily concentrate on serving the needs and interests of readers comprising only a very small portion of the viewers served by the Times Des Moines television station. Conversely, ownership by The Times of its daily newspaper in the small community of Lexington, North Carolina, a city with a population of less than 20,000 persons, 6 precludes its ownership of a

^{6 2000} U.S. Census.

station in the Greensboro/High Point/Winston-Salem television market-- a market that includes 600,000 TV households.⁷

In light of today's great diversity of media voices in virtually all communities, no legitimate public purpose continues to be served by the newspaper/broadcast cross-ownership rule. To the contrary, as shown in Section II of these comments, the rule prevents entities such as The Times from realizing the efficiencies of cross-ownership in its markets and from providing enhanced broadcast and newspaper services that would ultimately result in greater, not less, local diversity of news and information.

The benefits of local cross-ownership provide a particularly important public interest consideration in an era that has seen both greatly increased media concentration on a national scale and greatly increased fragmentation of television viewing audiences. Faced with steady year-by-year diminution of their viewing shares and the elimination of network compensation, the ability of local television stations to fund substantial local news operations has come under increasing pressure. This difficulty is further compounded for television stations that do not enjoy the economies of scale realized by a relatively small number of national video production and distribution entities that each own very large numbers of stations. The Commission should now permit these economies of scale to be shared at the local level by owners of stations in markets of all sizes. All such station owners will then be free to use combined

⁷ Nielsen market rankings, 2001.

electronic/print resources to provide superior news and information services, cost effective advertising opportunities, and enhanced local websites.

II. The Experience of The Times Demonstrates That Repeal of the Cross-Ownership Rule Will Produce Real Public Interest Benefits.

The Times has had substantial experience in attempting to create new and enhanced news and information services on the local level through joint use of the resources of newspapers, broadcast stations and cable systems. We believe that a summary of some of this experience will assist the Commission in understanding both the potential public interest benefits of local media cross-ownership and the constraints that can seriously limit those benefits with respect to cooperative arrangements between local print and broadcast media that are not commonly owned.

(1) The WQXR experience.

The Times has been the owner of WQXR-FM ("WQXR") in New York City since 1944. The station's common ownership with The New York Times newspaper has been "grandfathered" under the present rules. WQXR has a classical music and fine arts program format, but also broadcasts news and a wide variety of features and commentaries about topics in the news, the arts, science and technology, books, restaurants, the theater and similar subjects of

⁸ The Times is also the owner of AM station WQEW, New York, which has similar grandfathered status. Programming for WQEW is presently provided under a time brokerage agreement by Radio Disney, a division of ABC Radio, and that station provides a radio programming service for children.

particular interest to its listeners. Virtually all of these non-music features are written, or written and delivered on-air, by <u>Times</u> staff members.

Attachment 3 hereto is the Declaration of Thomas J. Bartunek, General Manager of WOXR. Mr. Bartunek states that common ownership of WOXR and The New York Times and the station's consequent access to the newspaper's extraordinary staff of reporters and commentators, who have preeminent expertise in a broad spectrum of local, national and international subject areas, has been directly responsible for many of the programming services provided by WQXR. Mr. Bartunek's Declaration describes many of these current and past program services. Current programs include "The Front Page Preview," a daily summary of the stories being considered for the front page of the following morning's New York Times, written by Times reporter James Barron; "Washington Report," a daily morning commentary by reporters and columnists from the newspaper's Washington Bureau; "Inside the New York Times Book Review" (written by Book Review editor Charles McGrath or his designate); "Art and Antiques" (Rita Reif); "Restaurant Times" (both William Grimes and Eric Asimov); "The New York Times on Theater" (Lawrence Van Gelder, Peter Marks, Bruce Webber); and "Design of the Times" (Julie Iovine).

Similar program series broadcast in the recent past have included commentaries and features such as "On the Trail" (reports from the presidential campaign from Peter Marks); "Health Times" (Cornelia Dean); "Sports of the Times" (first Joe Durso, then Richard Sandomir); "Circuits" (derived from the newspaper's special section, first with Peter Lewis and then

Henry Fountain); and "The Advertising News" (Stuart Elliott). In earlier days, WQXR presented regular commentaries from then Managing Editor Clifton Daniel.

Mr. Bartunek states that WQXR's enhanced program service has been a direct result of the station's ownership by The Times:

It is highly unlikely that we would have been able to offer our listeners these commentaries and features were our station not owned by The New York Times Company. The Times has strongly encouraged its staffers to participate in our projects—sometimes during the recruitment process—and has made them available to us in ways that would simply not have happened if our station and the newspaper were competing, separately owned entities. Common ownership also affords us and our listeners an assurance of continuity: several of the commentaries and features have had many hosts through the years, as reporters and columnists come and go from the paper, but key topic areas are always covered by an exceptional professional. That permits us to plan and to commit resources to an extent that would not be possible were we dealing with unrelated third parties. Finally, the fact that our station and the newspaper share a common culture and a set of values, based on a shared tradition of journalistic and programming integrity, permits us to resolve sensitive content issues far more easily than would be the case with unrelated third parties.

Mr. Bartunek believes that the efficiencies resulting from common ownership also benefit both listeners and advertisers:

Common ownership also produces efficiencies for our station that lower our costs, thus reducing pressure on advertising rates and freeing up more resources for our programming efforts. Our costs for obtaining and administering employee health and retirement benefits, for example, are lower than would be the case if the station were required to obtain and administer equivalent benefits on its own. We also benefit from the Company's cash management, its stock purchase plan, and from the Company's wide ranging employee relations efforts—such as training, admission to cultural institutions (all of which help in our own employee recruitment and retention), and from the "halo" effect that results from our formal relationship with such an important New York institution.

Mr. Bartunek notes further that there are many cross-promotional benefits between the station and the newspaper that create value for each. In addition, WQXR is able to use proprietary market research data developed by the newspaper for its own strategic planning. Finally, because the audiences of the newspaper and station are similar in demographic and psychographic characteristics, the separate sales staffs can work together to create joint presentations for clients who want to reach that audience, providing benefits for the station and newspaper and increased efficiency for potential advertisers.

The long-term past experience of <u>The New York Times</u> and WQXR is thus one clear example of public benefits that flow directly from their common ownership.

(2) The Sarasota News Channel Experience.

In Sarasota, Florida, The Times owns <u>The Sarasota Herald-Tribune</u> ("<u>Herald-Tribune</u>"), a daily newspaper serving the city of Sarasota and Sarasota, Charlotte and Manatee Counties. The Times does not own any other media outlet or any cable systems in that area.

The <u>Herald-Tribune</u> does, however, provide a 24-hour, local cable news service on systems owned by Comcast under conditions more closely analogous to ownership of a newspaper and a television video outlet than do most such arrangements. There are three principal reasons why the conditions are closely analogous. First, the Comcast systems involved are franchised to serve all of Sarasota and Charlotte Counties and a portion of Manatee County, which comprise the major portion of the newspaper's area of circulation. While this is

still less than full coverage, Comcast's cable penetration is unusually high in the areas it serves (approximately 80%). Second, the agreement under which the cable news service is provided is for a ten-year term. Even allowing for the cable operator's rights to terminate or change the agreement under specified circumstances, this arrangement has permitted a degree of planning and resource commitment that would not be possible under a short-term arrangement. Finally, the Herald-Tribune is solely responsible for gathering, producing and presenting the news on the cable news channel, a fact that minimizes difficulties that arise owing to cultural conflicts and technological incompatibility of equipment.

Under these circumstances, the <u>Herald-Tribune</u> has been able to develop a high quality news channel (<u>Sarasota News Now 6</u> ("SNN6")), which has become an electronic local news service that is viewed in the homes in which it is carried by more persons per week than any other cable channel except The Weather Channel and which has 60% more viewers on a cumulative weekly basis than the next most viewed television <u>broadcast station</u> carried on the cable. SNN6 cablecasts the news in the form of successive thirty-minute programs throughout the day and night. These programs are continuously updated and changed so that, by evening of a typical day, the content has become largely different from the content earlier in the day.

Attachment 4 to these comments is the Declaration of Diane H. McFarlin, Publisher and Executive Editor of the <u>Herald-Tribune</u> and the person who has been responsible for SNN6 since its inception in 1995. Ms. McFarlin states

that it would not be possible for SNN6 to create either the quantity of original news programming that it cablecasts or to do so at its present high level of quality were it not for SNN6's operation by the <u>Herald-Tribune</u>. This is the case, Ms. McFarlin states, because there are substantial synergies and efficiencies that result from common ownership that benefit both the <u>Herald-Tribune</u> and SNN6. Ms. McFarlin describes these synergies as follows:

I start with the fact that a daily newspaper such as the Herald-Tribune is in the full-time business of providing a news service for the specific community it serves, which necessarily requires us to be closely involved in the life of our community on a day-to-day basis. Thus, while the Herald-Tribune does include national and international news provided by wire services, our primary focus must be on the needs and interests of Sarasota and its surrounding area. Our fundamental print news business provides an essential base for SNN6's operations. To this base we have added approximately 40 persons specifically employed by SNN6 -- eight in sales and the rest in news and production.

The primary area of convergence between the Herald-Tribune and SNN6 is in the news gathering process. We have a single unified news room for both operations, staffed by general and specialist reporters, and we hold joint news meetings there. All of our news personnel are subject to the same high ethical and journalistic standards that flow from being a part of The Times. Reporters for the Herald-Tribune and SNN6 share news tips, sources, background information and the substance of the news stories they obtain. Herald-Tribune reporters frequently provide some of the written material used by our on-air SNN6 anchors and reporters. SNN6's on-air production and presentation of the news requires a different set of skills from print reporting and Herald-Tribune print reporters only occasionally serve directly in those roles. Herald-Tribune reporters are, however, frequently interviewed on SNN6 about news stories they have covered and this provides an additional and important dimension to our news service.

Ms McFarlin also notes the important efficiencies that flow from joint operation of the newspaper and cable news channel:

Most of our employees operate under one roof and under a single general and administrative staff. The Herald-Tribune promotes SNN6 and SNN6 promotes the newspaper. As a result, many people tune in to SNN6

because of something they have read in the Herald-Tribune and many people look to the Herald-Tribune for more information about something they have seen on SNN6. Although advertisers usually purchase advertisements in the Herald-Tribune and on SNN6 for different purposes and to target different readers or viewers, we make an effort to sell the two in combination (and in combination with our web site) as complementary advertising buys that can efficiently be made with a single purchase. All of these efficiencies also permit us to devote even greater resources to our essential mission, which is gathering and presenting news and information to the public.

Ms. McFarlin concludes that SNN6 is a far better video news service because it is owned and operated by the <u>Herald-Tribune</u>. She believes that the advantages of common ownership would be even greater in the case of a newspaper and a local television station -- particularly in view of the future possibilities for full-time local news services utilizing one segment of a television station's digital channel.

(3) Other Cooperative Efforts -- and Their Limitations

The Times television stations have, to varying degrees, also attempted to enter into cooperative arrangements with non-owned newspapers and cable systems in their markets. These efforts are described in more detail in Attachment 5, the Declaration of Cynthia H. Augustine, President of The New York Times Broadcast Group.⁹ Ms. Augustine describes the formal or informal cooperative arrangements the Times stations presently have with local newspapers in Moline, Oklahoma City and Memphis and with cable systems in

⁹ The radio and television stations of The Times are licensed to wholly-owned subsidiaries, but all are functionally considered part of the Broadcast Group.

Memphis, Fort Smith and Scranton. The cable system agreements have generally arisen in the context of retransmission consent negotiations.

As Ms. Augustine states, all of these arrangements have resulted in some elements of new or improved service to the public. The cable system agreements, for example, involve the programming of cable local news channels by Times television stations. These channels are used primarily to provide time diversity for the stations' regular newscasts, which are re-run on the cable channels. In several markets, particularly Memphis, the cable news channel has been used for the creation of some original programming, such as town hall meetings on education funding and reform, live viewer forums concerning education, political debates, programs dealing with energy conservation and children's issues, and local sports and consumer programming. In Moline, where the station operates under news sharing arrangements with a local newspaper, both the newspaper and the station have enhanced their abilities to cover certain news events and have done joint projects concerning matters such as the advantages and disadvantages of economic development and expansion.

All of these joint efforts have resulted in a net public benefit, but there are substantial constraints on the service The Times is able to provide through agreements with unrelated parties. Ms. Augustine lists four such limitations:

First, all such arrangements are either informal or time-limited pursuant to specific contractual agreements. (Some of these arrangements are retransmission consent agreements with cable operators.) Under such

conditions, we are limited in the resources we can prudently commit on a long-term basis and in the long term strategic planning we can do to maximize the service we will provide. Our Sarasota cable news channel, for example, has taken six years to reach a point at which we believe it will be profitable next year. We could not do what we have done there under a short-term agreement.

Second, none of our existing arrangements permits us to provide additional or enhanced services to an entire television market. The Memphis cable news channel, for example, is carried in fewer than one-third of the television households in the Memphis DMA.

Third, technology can be a difficult problem when two independent organizations seek to operate cooperatively. Today's television and newspaper news rooms both operate with highly sophisticated and expensive electronic infrastructures. It can be very difficult for two separate business entities with differing strategy for capital investment to agree on the particular investments to be made in their separate news rooms, particularly under short-term cooperation agreements. The electronic exchange of pictures and text news materials has been a constant struggle in newspaper/television convergence efforts.

Finally, but not least, different companies inevitably operate under their own unique cultures and internal standards. Even assuming the best of will on the part of each party, joint operations on a day-to-day basis under these conditions present inevitable difficulties, particularly when there is no clear agreement that one party to an arrangement is to have primary responsibility for a news operation.

The Times believes strongly that common ownership of a newspaper and a television station in the same market will permit both the newspaper and the station to provide a significantly enhanced service to the public. Noting the positive results that have been produced by the synergies and efficiencies realized at WQXR and in Sarasota, Ms Augustine concludes:

The same synergies and efficiencies should be achievable in our television markets and in The Times's other newspaper markets. Using the combined staffs of a newspaper and a television station, we will not only be able to increase our joint news gathering capacity, but to optimize our use of the unique attributes of each medium -- a newspaper's in-depth news gathering resources, including a greater number of specialist reporters and its ability to present news in far

greater detail, and the mass audience reach and special visual appeal of television. In addition to this more efficient use of combined resources, we would also have the ability to do coordinated long-term planning; we could have coordinated compatible technology; and we would share a common internal culture. Taken together, these factors will permit both our television stations and our newspapers to do a better job than either could alone in fulfilling their common essential mission, which is to provide the highest possible news and information services to their viewers and readers. We look forward, for example, to a time when we may be able to provide a 24-hour local news service as one portion of the digital transmission services that each of our stations will provide to its entire DMA.

(4) Full Repeal of the Newspaper/Broadcast Ownership Rule Will Increase Both Diversity and Competition on the Local Level.

The experience of The Times shows that elimination of the newspaper/broadcast cross-ownership rule will result in an increase, not a decrease, in the quality and diversity of local news and information services available to the public. A combined newspaper/broadcast operation will be able to assign more reporters and news teams to provide in-depth coverage of different local events than would be the case if each were assigning its own reporters to provide duplicative coverage of the same local events. 10 Moreover, the greater institutional strength of such a combined operation would not only increase its financial capacity to take on new and innovative projects, such as digital all-news channels, but would solidify its independence and insulation from both political and advertiser pressures.

¹⁰ A newspaper/broadcast combined operation could, for example, utilize ten reporters to cover ten different news events or issues rather than each sending five reporters to cover the same five events. Alternatively, larger news teams could be used to provide greater in-depth coverage of specific matters.

Full repeal of the rule in all but the most highly concentrated markets is particularly important as a small number of national media companies continue to grow more dominant. As the national TV ownership cap has been steadily raised to its present 35% level (which frequently permits national coverage far exceeding 35% by reason of the UHF discount), the number of stations owned by a relatively small number of national media companies has grown to unprecedented levels.¹¹ The 35% national TV cap is currently under serious challenge both in the courts and before the FCC and Congress, and it thus appears likely that there will be still further consolidation in the future, particularly if the newspaper/broadcast rule is relaxed for large markets. 12 Under these circumstances, it would be highly inappropriate to limit any relaxation of the newspaper/broadcast rule only to large markets. To permit the owners of television stations in smaller communities to compete in their markets with newspapers and stations owned by national media giants, complete repeal of the rule is essential for virtually all markets.¹³

A vibrant local media presence will only be maintained if those companies focused on the local marketplace in communities of all sizes -- local

¹¹ See <u>Broadcasting and Cable</u>, Annual Survey of TV Stations Groups, April 23, 2001, at pp. 59-80.

¹² A recent trade press report, for example, states: "Gannett and Hearst-Argyle Television (HTV) executives have had 'very preliminary' conversations about melding their TV operations, with Gannett the buyer. Included in the talks, sources say, is Disney, which might get one or more of HTV's ABC affiliates, which include WCVB-TV, Boston and WTAE-TV, Pittsburgh, in a spin-off." Broadcasting and Cable, November 19, 2001, at p.4.

¹³ The only exceptions should be those few markets similar to "the most egregious" case in which divestiture was required when the FCC grandfathered most newspaper/broadcast cross-ownership at the time it adopted the present rule. See <u>Second Report and Order in Docket 18110</u>, 50 FCC 2d 1046 (1975), paragraph 112.

newspapers and broadcast stations with strong local news commitments -- are permitted to operate in a way that combines, rather than splits, their comparatively limited resources. Gathering, editing and distributing news is an expensive activity. The competitive pressures on local broadcasters are already beginning to cause many television stations to consider reducing the resources devoted to local news. These pressures can only intensify as network compensation revenue disappears. Daily newspapers, which are generally the largest news organizations in a community, are subject to similar financial pressures. Full repeal of the cross-ownership rule would permit newspapers and stations to work together to optimize use of their joint news gathering capacities. The public will be the ultimate beneficiary when this occurs. ¹⁴

III. Television Stations and Newspapers Are Not in Substantial Competition for Advertising Dollars.

As the NAA will show in its comments, television stations and newspapers do not compete materially for the same advertising dollars or, put differently, the two types of advertising are not close substitutes for each other. That has also been the experience of The New York Times Broadcast Group. While it is undoubtedly true that television stations and their trade associations have in the past made efforts to divert to TV portions of

Elimination of the rule would not, in the case of The Times, result in any loss of national media diversity. The stations and regional newspapers of The Times operate so as to serve the needs of their own communities. While The Times requires adherence to high journalistic standards, the local newspapers and stations are free to take their own positions on substantive issues. Indeed, different newspapers owned by The Times have in the past endorsed different Presidential candidates.

advertisers' budgets for newspapers, far more successful sales strategies on the part of newspapers and television stations that attempt to sell newspaper and television advertising jointly have been efforts to sell the two types of advertising as a total package that serves complementary purposes.

Attachment 6 hereto is the Declaration of James Beloyianis. Mr. Beloyianis is the President of Katz Television Group, a "national spot rep" organization that sells national spot advertising for a number of different television clients. National spot advertising consists of spots that advertisers place directly on local television stations, as contrasted with other national advertising that advertisers buy on television or cable networks. Mr. Beloyianis has had 28 years of day-to-day experience in selling national spot advertising. His Katz Television Group is a subsidiary of Katz Media Group, which has other subsidiaries that sell national spot advertising on radio and on cable.

Mr. Beloyianis states that in his many years of experience he has never been in a situation in which he felt that he was competing with newspapers for national advertising dollars. His competition has been primarily with television and cable networks, with those selling national spot advertising for other television stations, to a much lesser extent with radio networks and stations and, to a small extent thus far, with Internet advertising.

Mr. Beloyianis states that to the extent national advertising is placed in newspapers, such advertising comes from budgets that are totally separate for the budgets advertisers have for national television advertising. He believes that this reflects different advertiser objectives for the two media. Television advertising is best at depicting sight, sound, motion and feelings and for conveying striking visual images. Newspaper advertising, on the other hand, has greater residual value and can offer far more detail concerning products and pricing. Because advertisers seek to achieve these different objectives in the different media, he has not found it a productive use of the time of his organization to try and divert newspaper advertising dollars to national spot television.

Attachment 7, the Declaration of Kenneth A. Sossaman, provides further information with respect to the decisions advertisers make in allocating their budgets between television and newspapers. Mr. Sossaman is the President of Sossaman Associates, one of the largest advertising agencies in Memphis, Tennessee (a city in which a Times subsidiary is the licensee of WREG-TV). He has been in the business of purchasing advertising for clients and helping clients develop their media buying strategies for more than 25 years.

Mr. Sossaman states that advertisers establish a plan and ultimately purchase advertising on television and in newspapers by judging each medium on its own specific strengths and efficiencies so as to best reach their target audiences at the lowest cost. Mr. Sossaman notes four factors considered by advertisers in making their budget allocations.

The first factor is the specific target audience an advertiser seeks to reach.

Newspaper readers tend to be weighted more heavily toward older and more upscale demographic groups than are the audiences for most television programs. Television buys are based on specific programs and time periods

and the unique audiences associated with specific programs, based on Nielsen estimates. Newspaper advertising purchases, too, can be based on the readers of a newspaper on specific days and specific sections of the newspaper can be used to increase exposure to a specific audience.

Second, television advertising and newspaper advertising each have their own unique advantages in presenting particular types of messages most effectively. Mr. Sossaman notes television's effectiveness in "branding" advertisements and in presenting messages requiring an immediate response. Newspapers, on the other hand, can offer greater detail about an advertiser's products or services and can call a person to action with the use of sales, offers and coupons or through detailed information to which a reader may refer to in deciding whether to make a purchase.

Third, geographic coverage can be important. Mr. Sossaman notes that most television DMA's in the United States are very large and that many newspapers within a DMA serve more limited areas. Each advertising client's objectives determine the best use of its advertising dollars. A local Memphis store that is patronized primarily by Memphis residents may buy less wasted coverage by advertising in the Memphis newspaper than on a Memphis television station. Similarly, a small business serving an outlying community or a candidate for office in a community comprising only a small portion of a DMA may do better with an outlying newspaper or radio station.

¹⁵ The Memphis DMA includes 30 counties in Tennessee, Arkansas, Mississippi and Missouri.

Finally, Mr. Sossaman states, an advertiser seeks the most cost-efficient buy possible consistent with the other factors he describes. Cost efficiency is used more in comparing one TV station to another TV station than in comparing one medium with another. A small newspaper ad, for example, has a very different cost-per-thousand readers from a large newspaper ad, but an advertiser may well decide that a large ad best serves its purposes. The best cost-per-thousand comparison for newspapers, Mr. Sossaman states, would be between two competing newspapers.

Mr. Sossaman concludes that the advertising products being sold by newspapers and by television stations "are not the same and should be judged on the strengths of each." When an advertiser buys both newspaper and television advertising, Mr. Sossaman states, that means that the advertiser has determined that both media are needed to reach its target audience.

Combination packages that would enable an advertiser to accomplish this objective would, in Mr. Sossaman's view, benefit both the media and the advertiser.

The experience of The Times confirms the views expressed in the Declarations of Mr. Beloyianis and Mr. Sossaman, as evidenced by Attachment 8 hereto, the Declaration of Maureen A. O'Connor. Ms. O'Connor has been the General Sales Manager of Times television station WREG-TV, Memphis, for the past three years and, prior to that, had spent more than 16 years in Times newspaper advertising sales.

Ms. O'Connor's experience has been that newspapers and television stations serve advertiser needs in different ways. Television excels in image advertising and in showing products such as automobiles in motion.

Television use is targeted to appeal to the feelings and emotions of specific demographic audiences that watch specific television programs. Newspaper advertising can offer more details about products or services such as grocery store specials, price and product information about an auto dealer's array of new and used cars, or about real estate offerings or employment opportunities.

Department stores tend to use newspapers extensively to display a wide range of products and to permit readers to have the pictures and prices of those products available from the ads for several days.

Ms. O'Connor confirms that larger advertisers tend to have distinct budgets for television, newspapers, other types of media, and for indirect forms of promotion such as charitable contributions and public service activities.

She observes:

While trade organizations (such as the Television Bureau of Advertising) attempt to promote the advantages of one medium over the other, individual television stations tend to compete primarily with each other in selling advertising. To the extent television stations try to compete directly with newspapers for advertising dollars that an advertiser has earmarked for print so as to reach different people or to deliver a message with different content, stations have not had much success. Our own focus in trying to create joint advertising offerings with newspapers has been to put together packages that will enable an advertiser to achieve different objectives with a single buy, and to focus on categories of business that neither a newspaper or a television station has been successful in developing individually, such as combined newspaper/television campaigns appealing to senior citizens or advertising an upcoming event.

In sum, advertisers tailor their advertising purchases to specific needs that are usually best served by the unique attributes of different media and television and newspapers thus do not compete materially for the same advertising dollars.

CONCLUSION

The relevant markets for television and newspaper advertising are not the same, but the "market" for diversity purposes is far more extensive. For purposes of diversity, any independently owned "voice" serving a common area is a separately owned source of news, information or opinion, without regard to the means by which that voice may be transmitted to a listener, viewer or reader. In today's media-saturated environment, the average resident of even a small community is literally bombarded throughout a typical day by a vast multiplicity of sources of news, information and opinion -- sources that include television, radio, newspapers, local and national cable and satellite program services, local, regional and national Internet sites, magazines, other print media and local civic meetings and forums.

Given the rich and diverse media environment that the Commission has explicitly acknowledged in its rule making notice in this proceeding, it is clear that the facts that supported the newspaper/broadcast rule when it was adopted have now materially changed. The newspaper/broadcast rule is no longer necessary to insure that there will be a broad diversity of media voices available to consumers, nor is the rule needed to preserve competition in any advertising market. There accordingly remains no public interest justification

for the rule's retention. On the other hand, as we have shown in these comments, elimination of the rule for all but the most highly concentrated markets will improve the quality and diversity of news and information services available to the public. The Commission should therefore comply with the direction of Congress in Section 202(h) of the Telecommunications Act of 1996 and should repeal the rule as "no longer in the public interest." ¹⁶

Respectfully submitted,

THE NEW YORK TIMES COMPANY

Bv:

Arthur B. Goodkind

Holland & Knight LLP 2099 Pennsylvania Avenue Suite 100

Washington, D.C. 20006 (202) 457-1815

Its Attorneys

December 3, 2001

¹⁶ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat.56 (1996), Section 202(h).

COMPETING MEDIA IN TELEVISION MARKETS IN WHICH THE NEW YORK TIMES OWNS TELEVISION STATIONS

SOURCES:

Information concerning Designated Market Areas (DMA's) for television, as published in *Broadcast & Cable Yearbook 2001*. Radio and television ownership information as published in that *Yearbook* or as stated in The Federal Communication Commission's Consolidated Broadcast Database (CDBS).

Market by market cable penetration figures as most recently reported by Nielson Media Research for each station's DMA. State by state direct-to-home satellite penetration figures as of October 1, 2001 are in the aggregate for DirecTV, EchoStar and C-band subscriptions, as reported in *SKY Research*, Volume 8, No. 11, November 2001, a publication of Media Business Corp.

Information with respect to daily and non-daily newspapers in each DMA as reported in *Editor & Publisher International Yearbook 2001* (New York, New York, 2001), updated where later information available. The ownership of newspapers is as reported in that publication. Where no ownership is listed, no ownership information was provided in the *Yearbook*.

DES MOINES-AMES-NEWTON DMA MO. 70

TELEVISION

Number of television stations: 9

Number of granted construction permits: 1

Owners within this market:

Capital Communications Co., Inc. Hearst-Argyle Television, Inc. Iowa Public Broadcasting Board Pappas Telecasting Companies ("Construction Permit")

Paxson Communications Corporation

Sinclair Broadcasting Group, Inc.

The New York Times Company

RADIO

Number of radio stations and radio construction permits: 84

Owners within this market, excluding those that also own television stations:

AMFM Holdings, Inc.

Barnstable Broadcasting, Inc.

Boone Biblical Ministries, Inc.

Carroll Broadcasting Co.

C.D. Broadcasting, Inc.

Central College

Central Iowa Broadcasting, Inc.

Charles E. Putbrese

Clear Channel Communications, Inc.

Coon Valley Communications

 ${\bf Crawford\ Broadcasting\ Co.}$

Crown Broadcasting Co.

Des Moines Indep. Com. School Dist.

Eldora Broadcasting Co.

Family Stations, Inc.

FMC Broadcasting, Inc.

G.O. Radio, Inc.

H&H Broadcasting Corp.

Iowa Central Community College

Iowa State University of Science and Technology

Jomast Corp.

KCOG, Inc.

Lifestyle Communications, Inc.

Marshalltown Broadcasting, Inc.

M & H Broadcasting, Inc.

Meredith Communications L.P.

Min-Iowa Christian Broadcasting, Inc.

Minority Communications, Inc.

"O"- Town Communications, Inc.

PBW Broadcasting Corp.

Perry Broadcasting Co.

Positive Impact Media, Inc.

Residence Associates Broadcasting Service, Inc.

Saga Communications, Inc. (also listing Saga Communications of Iowa, Inc.)

Simpson College

Sorenson Broadcasting Corporation

Three Eagles Communications

Trustees of Iowa College

Two Rivers Broadcasting Limited Partnership

Waitt Broadcasting, Inc.

Warren Broadcasting

West Des Moines Community School District

William Penn College

CABLE

DMA Cable penetration: 61%

SATELLITE

Satellite penetration: 23.28% (State of Iowa)

NEWSPAPERS

Daily newspapers within this market (by county); with ownership when available:

Ad Express & Daily Iowegian; Centerville, Appanoose County; Community Newspaper Holdings, Inc.

Boone News-Republican; Boone, Boone County

Daily Times Herald; Carroll, Carroll County

The Daily Freeman-Journal; Webster City, Hamilton County; Ogden Newspaper, Inc.

The Newton Daily News; Newton, Jasper County; Shaw Newspapers

Oskaloosa Herald; Okaloosa, Mahaska County; Community Newspaper Holdings, Inc.

Times-Republican; Marshalltown, Marshall County; Ogden Newspapers, Inc.

The Des Moines Register; Des Moines, Polk County; Gannett Co., Inc.

The Tribune; Ames, Story County; Omaha World-Herald

Creston News-Advertiser; Creston, Union County; Shaw Newspapers

The Messenger; Ft. Dodge, Webster County; Ogden Newspapers

Weekly publications within this market (by county); with ownership when available:

The Adair News (Thursday); Adair-Casey, Adair & Guthrie Counties

Stuart Herald (Thursday); Stuart-Guthrie, Adair & Guthrie Counties

Adair County Free Press (Wednesday); Greenfield, Adair County

<u>Fontanelle Observer</u> (Wednesday); Fontanelle-Bridgewater-Greenfield-Massena, Adair & Cass Counties; Pederson Publication, Inc.

Moravia Union (Wednesday); Moravia, Appanoose County

Audubon County Advocate Journal (Friday); Audubon-Exira-Brayton, Audubon County

Boone Today (Tuesday; Saturday); Boone, Boone County; Partnership Press, Inc.

Madrid Register-News (Thursday); Madrid, Boone County

The Lake City Graphic (Wednesday); Lake City, Calhoun County

Journal Herald (Thursday); Manson, Calhoun County

Breda News (Wednesday); Breda, Carroll County

Coon Rapids Enterprise (Thursday); Coons Rapids, Carroll & Guthrie Counties

The Glidden Graphic (Wednesday); Glidden, Carroll County

Manning Monitor (Thursday); Maning. Carroll County; LV Publishing Co.

Osceola Sentinel-Tribune (Thursday); Osceola, Clarke County

Perry Chief (Friday); Perry, Dallas County; Chief Printing Co.

Dallas County News & Roundup (Thursday); Adel, Dallas County; Iowa Newspapers, Inc.

Western Express (Friday); West Des Moines, Dallas & Polk Counties

Lamoni Chronicle (Wednesday); Lamoni, Decatur County

<u>Hampton Chronicle</u> (Wednesday); Hampton, Franklin County; Mid-America Publishing Co.

Hampton Times (Tuesday); Hampton, Franklin County; Mid-America Publishing Co.

World Journal (Wednesday); Ackley, Franklin & Hardin Counties

Dows Advocate (Thursday); Dows, Franklin & Wright Counties

Greene Recorder (Wednesday); Greene, Greene County

Scranton Journal (Wednesday); Scranton, Greene County

Jefferson Herald (Thursday); Jefferson, Greene County; Bee & Herald Publishing Co., Inc.

<u>The Bee</u> (Tuesday); Jefferson, Greene County; Bee & Herald Publishing Co., Inc. (Greene County Enterprises)

The News Gazette (Thursday); Bayard-Bagley, Guthrie County

Guthrie Center Times (Wednesday); Guthrie County

Guthrie County Vedette (Thursday); Panora, Guthrie County

South Hamilton Record-News (Thursday); Jewell, Hamilton County

Stratford Courier (Wednesday); Stratford, Hamilton & Webster Counties

Eldora Herald-Ledger (Tuesday); Eldora, Hardin County; Herald-Index Publishing Co.

<u>Times-Citizen</u> (Wednesday, Saturday); Iowa Falls, Hardin County

Humboldt Independent (Thursday); Humboldt, Humboldt County

Jasper County Tribune (Thursday); Colfax-Baxter-Mingo, Jasper County

Monroe Legacy (Thursday); Monroe-Otley-Reasnor, Jasper County

Prairie City News (Thursday); Prairie City, Jasper County

Diamond Trail News (Wednesday); Sully, Jasper County

<u>Chariton Herald-Patriot</u> (Thursday); Chariton, Lucas County; Lancaster Management, Inc.

Enterprise-Record (Thursday); State Center-Melbourne, Marshall County

Albia Union-Republican (Thursday); Albia, Monroe County; Lancaster Management, Inc.

The Algona Upper Des Moines (Thursday); Algona, Kossuth County

The Bancroft Register (Wednesday); Bancroft-Lakota-Ledyard, Kossuth County

Swea City Herald-Press (Wednesday); Swea City, Kossuth County

Titonka Topic (Thursday); Titionka, Kossuth County

West Bend Journal (Thursday); West Bend-Rodman-Ottosen, Kossuth & Palo Alto Counties

Winterset Madisonian (Wednesday); Winterset, Madison County

Fremont Gazette (Thursday); Fremont, Mahaska County

New Sharon Star (Thursday); New Sharon, Mahaska County

Eddyville Tribune (Thursday); Eddyville, Mahaska & Monroe Counties

Pella Chronicle (Thursday); Pella, Marion County; Community Newspaper Holdings, Inc.

The Knoxville Journal-Express (Friday); Knoxville, Marion County; Community Newspaper Holdings, Inc.

The Laurens Sun (Thursday); Laurens, Pocahontas County

<u>Pocahontas Record-Democrat</u> (Tuesday); Pocahontas-Fonda-Rolfe, Pocahontas County; Buena Vista County Journal

<u>Altoona Herald-Mitchellville Index</u> (Thursday); Altoona-Mitchellville-Bondurant-Runnels-Pleasant Hills, Polk County; Gannett Co., Inc.

Grinelle Herald-Register (Monday, Thursday); Grinnelle, Poweshiek County

Montezuma Republican (Wednesday); Montezuma, Poweshiek County; Marengo Publishing Corp.

The Brooklyn Chronicle (Wednesday); Brooklyn, Poweshiek County; Marengo Publishing Corp.

Ankeny Press Citizen (Wednesday); Ankeny, Polk County; Ogden Newspapers

Mount Ayr Record-News (Thursday); Mt. Ayr, Ringgold County

Nevada Journal (Thursday); Nevada, Story County; Partnership Press, Inc.

The Story City Herald (Wednesday); Story City-Roland, Story County

<u>Tri-County Times</u> (Wednesday); Slater-Huxley-Kelly-Cambridge-Collins-Maxwell-Baxter-Elkhart, Story County

The Bedford Times-Press (Wednesday); Bedford, Taylor County

Afton Star-Enterprise (Thursday); Afton, Union County

Record-Herald & Indianola Tribune (Wednesday); Indianola, Warren County; Gannett Co., Inc.

North Warren Town & County News (Thursday); Norwalk, Warren County; Klein Publications, Inc.

<u>Corydon Times Republican</u> (Tuesday); Corydon, Wayne County; Lancaster Management, Inc.

<u>The Humeston News Era</u> (Tuesday); Mormon Trail Community, Wayne County; Wayne County Newspapers

The Seymour Herald (Wednesday); Seymour-Promise-Plano-Cincinnati-Nama-Corydon-Centerville, Wayne County

<u>Dayton Review</u> (Wednesday); Dayton, Webster County

The Gowrie News (Wednesday); Gowrie, Webster County

Clarion Wright County Monitor (Thursday); Clarion, Wright County

<u>Eagle Grove Eagle</u> (Wednesday); Eagle Grove, Wright County; Mid-America Publishing Corp.

The Belmond Independent (Thursday); Belmond, Wright County

The Post-Telegraph (Thursday); Princeton, Mercer County, MO

FORT SMITH-FAYETTEVILLE-SPRINGDALE-ROGERS DMA NO. 107

TELEVISION

Number of television stations: 8

Number of granted construction permits: 0

Owners within this market:

Arkansas Educational Television Commission Griffin Entities Hearst-Argyle Television Inc. The New York Times Total Life Community Educational Foundation

RADIO

Number of radio stations and radio construction permits: 52

Owners within this market, excluding those that also own television stations:

American Family Radio

AMFM, Inc.

Big Chief Broadcasting Co.

Board of Trustees of the University of Arkansas

Bragg Broadcasting, Inc.

Bulter Broadcasting, LLC

Clear Channel Communications, Inc.

Cumulus Media, Inc.

Family Communications, Inc.

Fred H. Baker, Sr.

Gayla Joy McKenzie

Gulfstar Communications, Inc.

John Brown University

KERM, Inc.

KUOA, Inc.

LeRoy Billy

Ozark Communications, Inc.

 $Phar is\ Broadcasting,\ Inc.$

Prime, L.L.C.

River Valley Radio Group, LLC

Toccoa Falls College

Vinewood Communications

Vision Ministries, Inc.

William B. Disney & Martha J. Disney

CABLE

Cable penetration: 64%

SATELLITE

Satellite penetration: 31.55% (State of Arkansas); 24.19% (State of Oklahoma)

NEWSPAPERS

Newspaper within this market (by county); with parent companies when available:

<u>Arkansas Democrat Gazette</u>: Published in Little Rock and also Lowell (Benton County); Arkansas Democrat Gazette, Inc.

Benton County Daily Record; Bentonville, Benton County; Community Publishers, Inc.

SouthWest Times Record; Ft. Smith, Sebastian County; Stephens, Inc.

NorthWest Arkansas Times; Fayetteville, Washington County; Arkansas Democrat Gazette, Inc.

The Morning News; Springdale-Rogers, Washington County; Stephens, Inc.

<u>Poteau Daily News & Sun;</u> Poteau, LeFlore County, OK; Community Newspaper Holdings, Inc.

Weekly publications within this market (by county); with parent companies when available:

<u>Hometown News</u> (Wednesday); Rogers, Benton County; Community Publishers, Inc. <u>The Herald-Leader</u> (Wednesday, Sunday); Siloam Springs, Benton County; Community Publishers, Inc.

The Weekly Vista (Wednesday); Bella Vista Village, Benton County; Community Publishers. Inc.

<u>Van Buren Press Argus-Courier</u> (Wednesday, Saturday); Van Buren-Alma, Crawford County; Westward Communications, LLC

<u>Charleston Express</u> (Wednesday); Charleston, Franklin County; Donrey Media Group <u>The Spectator</u> (Wednesday); Ozark, Franklin County

Booneville Democrat (Wednesday); Booneville-Magazine, Logan County; Donrey Media Group

Paris Express (Wednesday); Paris, Logan County; DR Partners

The Waldron News (Wednesday); Waldron, Scott County; Lancaster Management, Inc.

<u>The Citizen</u> (Wednesday); Mansfield, Sebastian & Scott Counties; Lancaster Management, Inc.

<u>The Prairie Grove Enterprise</u> (Thursday); Prairie Grove-Farmington, Washington County; Ozark Newspapers, Inc.

Spiro Graphic (Thursday); Spiro, Le Flore County, OK

Talihina America (Thursday); Talihina, Le Flore County, OK

Sequoyah County Times (Thursday, Sunday); Sallisaw, Sequoyah County, OK

HUNTSVILLE-DECATUR-FLORENCE DMA NO. 82

TELEVISION

Number of television stations: 7

Number of granted construction permits: 0

Owners within this market:

Alabama ETV Commission Gocom Communications LLC Grant Communications Les White Raycom Media, Inc. The New York Times Valley Television LLC

RADIO

Number of radio stations and radio construction permits: 68

Owners within this market, excluding those that also own television stations:

Abercrombie Broadcasting Co.

A.D. Oppenheim & Daniel L. Oppenheim

American Family Radio

AMFM, Inc.

Appalachian Educational Communication Corp.

Arab Broadcasting Co., Inc.

Athens Broadcasting Co.

BCA Radio, LLC

BCB Inc.

Barinowski Investment Co. L.P.

Barnstable Broadcasting, Inc.

Belz Broadcasting Co.

Benny Carle Broadcasting, Inc.

Bible Broadcasting Network, Inc.

Big River Broadcasting Corporation

Board of Trustees, Alabama A&M University

Bonner and Carlile Enterprises

Bott Broadcasting

Boyd Enterprises, Inc.0

Capstar Royalty II Corp.

Central Broadcasting Co.

Clear Channel Communications, Inc.

Covington Broadcasting, Inc.

Cox Broadcasting

Cumulus Media, Inc.

Delgiorno Broadcasting Corp.

Delta Broadcasting, Inc.

Dr. Pepsi/Pesi Cola Bottling Co of Dyersburg, Inc.

Elijah Mondy, Jr.

East Arkansas Educational Foundation

Flinn Broadcasting Corp.

Freed Hardeman University

Fun Media Group, Inc.

Gerald W. Hunt

Guntersville Broadcasting Co., Inc.

Hundley Batts, Sr. & Virginia Caples

Jamar Communications Inc.

James K. Sharp, dba, 5th Ave Broadcasting

Jimmy R. Pyle

John M. Dowdy

KEA Radio, Inc.

Kenneth Thomson, Deborah Thomson & Ron Dykes

K-Love Radio Network

Lake City Educational Broadcasting, Inc.

Lake Forest City Broadcasting, Co., Inc.

Limestone Broadcasting Co.

Magnolia Broadcasting Co.

McCurry Broadcasting Co., Inc.

Mid South Public Communications Foundation

Milan Broadcasting, Inc.

Mountain Mist Media, LLC

Muscle Shoals Broadcasting

NCA, Inc.

New England Communications, Inc.

 $Newport\ Broadcasting\ Co.$

Oakwood College

Patricia A. King

Pollack Broadcasting Co.

Priority Communications LLC

R&B Communications, Inc.

Sand Mountain Advertising Co., Inc.

Sand Mountain Broadcasting Service, Inc.

Shoals Broadcasting Corp.

Slatton & Associates

Sudbury Services, Inc & Newport Broadcasting Co.

Sunshine Broadcasters

Tennessee Valley Radio, Inc.

The Wireless Group, Inc.

Thomas Media, Inc.

Tri-State Inspirational B/C Corp.

Williams Communications, Inc.

WDTM, Inc.

World Overcomers Outreach Ministries Church, Inc.

CABLE

Cable penetration: 67% per Nielsen

SATELLITE

Satellite penetration: 24.63% (State of Alabama); 25.28% (State of Tennessee)

NEWSPAPERS

Newspapers within this market (by county; with parent companies when available:

<u>Times Daily</u>; Florence-Sheffield-Tuscumbia-Muscle Shoals, Colbert & Lauderdale Counties; NYT Company

The Cullman Times; Cullman, Cullman County; Community Newspaper Holdings, Inc.

The Times Journal; Ft. Payne, DeKalb County; Southern Newspaper, Inc.

The Daily Sentinel; Scottsboro, Jackson County; Southern Newspapers, Inc.

The News-Courier; Athens, Limestone County; Community Newspaper Holdings, Inc.

The Huntsville Times; Huntsville, Madison County; Advance Publications (AL)

The Decatur Daily; Decatur, Morgan County

Weekly publications within this market (by county); with parent companies when available:

Sheffield Standard & Times/Colbert County Reporter (Tuesday, Thursday); Sheffield, Colbert County

Colbert County Reporter (Friday); Tuscumbia, Colbert County

Hanceville Herald (Wednesday); Hanceville, Cullman County

DeKalb Advertiser (Tuesday, Thursday); DeKalb, DeKalb County

Weekly Post (Thursday); Rainsville, De Kalb County; Southern Newspapers, Inc.

Gadsden Messenger (Monday to Saturday); Gadsden, Etoway County; the New York Times Company

North Jackson Progress; Stevenson, Jackson County

<u>Franklin County Times</u> (Wednesday, Friday, Sunday); Russellville, Franklin County; Boone Newspaper, Inc.

The Red Bay News (Wednesday); Red Bay, Franklin County

Courier Journal (Wednesday); Florence-Muscle Shoals, Lauderdale County

East Lauderdale News (Thursday); Rogersville, Lauderdale County

The Moulton Advertiser (Thursday); Moulton, Lawrence County; Slaton Newspapers, Inc.

Madison County Record (Thursday); Madison, Madison County

<u>Sand Mountain Reporter</u> (Tues, Thursday, Saturday); Albertville-Boaz, Marshall County; Southern Newspapers of AL, Inc.

Advertiser-Gleam (Wednesday, Saturday); Guntersville, Marshall County

The Arab Tribune (Wednesday); Arab, Marshall County

The Hartselle Inquirer (Thursday); Hartselle, Morgan County

Elk Valley Times/Observer & News (Wednesday); Fayetteville, Lincoln County, TN; Lakeway Publishers, Inc.

Standard and Times; Tuscumbia, Colbert County

The Wayne County News (Wednesday); Waynesboro, Wayne County, TN.

Northwest Alabamian (Wednesday, Saturday); Haleyville, Winston County; Mid-south Newspapers

MEMPHIS DMA NO. 40

TELEVISION

Number of television stations: 9

Number of granted construction permits: 0

Owners within this market:

Clear Channel Communications, Inc.

Flinn Broadcasting Corporation.

Fox Television Stations, Inc.

Mid-South Public Communications Foundation

Mississippi Authority for Educational TV

Raycom Media, Inc.

Trinity Broadcasting Network

The New York Times

RADIO

Number of radio stations and radio construction permits: 122

Owners within this market, excluding those that also own television stations:

Air South Radio, Inc.

American Family Radio

Arlington Broadcasting Co., Inc.

Barnstable Broadcasting, Inc.

Batesville Broadcasting Co., Inc.

Billy R. Autry

Board of Education Memphis City Schools

Bountiful Blessing, Inc.

B.R. & Martha S. Clayton

Clint Webster

Concord Media Group, Inc.

Contemporary Communications

Delta Christian Radio, Inc.

Entercom Memphis License, LLC

Gilliam Communications, Inc.

Infinity Radio, Inc.

Jesse C. Ross & Earnestine A. Ross

Joe Taylor Jobe

Keyboard Broadcasting Communications

K-Love Radio Network

Kudzu Communications, Inc.

Memphis Shelby City Public Library & Information Center

NMSC, Inc.

Pollack Broadcasting, Co.

Radio Cleveland, Inc.

Rust College, Inc.

San-Dow Broadcasting, Inc.

Sinclair Broadcast Group, Inc.

Southern Communication Volunteers, Inc.

Student Media Center of the University of Mississippi

Taylor Communications. Inc.

Telesouth Communications, Inc.

The University of Memphis

CABLE

Cable penetration: 63%

SATELLITE

Satellite penetration: 25.28% (State of Tennessee)

32.94% (State of Mississippi) 31.55% (State of Arkansas)

NEWSPAPERS

Newspapers within this market (by county); with parent companies when available:

Evening Times; West Memphis, Crittenden County, AR; Ricketson Newspapers

Blytheville Courier News; Blytheville, Mississippi County, AR; Rust Communications

The Daily World; Helena-West Helena, Phillips County, AR; Liberty Publishing

Times-Herald: Forrest City, St. Francis County, AR

The Daily Corinthian; Corinth, Alcorn County, MS; Paxton Media, Inc.

The Clarksdale Press Register; Clarksdale, Coahoma County, MS

DeSoto Times Today: Hernando, DeSoto County, MS; PH Publishing, LLC

The Oxford Eagle; Oxford, Lafayette County, MS

State Gazette: Dversburg, Dver County, TN; Rust Communications

The Commercial Appeal; Memphis, Shelby County, TN; E W Scripps Co.

Weekly publications within this market (by county); with parent companies when available:

East Arkansas News Leader (Wednesday); Wynne, Cross, Woodruff, Poinsett, St. Francis

& Crittenden Counties, AR

<u>Little River News</u> (Thursday); Little River-Sevier, Mississippi County, AR

Northeast Arkansas Town Crier (Tuesday); Manila, Mississippi County, AR; Rust

Communications

The Courier Index (Thursday); Marianna, Lee County, AR; Times-Herald Publishing

The Osceola Times (Thursday); Osceola, Mississippi County, AR

Truman Democrat (Wednesday); Truman, Poinsett County, AR; Delta South

Tri-City Tribune (Thursday); Marked Tree-Lepanto, Poinsett County, AR

The Modern News (Wednesday); Harrisburg, Poinsett County, AR

Southern Advocate (Thursday); Ashland, Benton County, MS

South Reporter (Thursday); Holly Springs, Marshall County, MS

Quitman County Democrat (Thursday); Marks, Quitman County, MS

DeSoto County Tribune (Wednesday); Olive Branch, DeSoto County, MS

The Southern Reporter (Thursday); Sardis, Panola County, MS; TSR Publication, Inc.

The Southern Sentinel (Wednesday, Saturday); Ripley, Tippah County, MS

The Democrat (Tuesday); Senatobia, Tate County, MS

The Tunica Times (Thursday); Tunica, Tunica County, MS

The Tuesday Democrat-Argus (Tuesday); Caruthersville, Pemiscot County, MO; Rust Communications

<u>The Wednesday Democrat-Argus</u> (Wednesday); Caruthersville, Pemiscot County, MO; Rust Communications

The Crockett Times (Thursday); Alamo, Crockett County, TN

<u>Dyer County Tennessean</u> (Friday); Dyersburg, Dyer County, TN; Rust Communications

Fayette County Review (Wednesday); Sommerville, Fayette County, TN

The Fayette Falcon (Wednesday); Sommerville, Fayette County, TN; Carl A. Jones Newspapers Press. Inc.

<u>The Tri-City Reporter</u> (Thursday); Dyer-Rutherford-Kenton, Gibson County, TN <u>Milan Mirror-Exchange</u> (Tuesday); Milan-Bradford-Atwood-Medina-Gibson-Lavinia, Gibson County, TN

The Herald Gazette (Wednesday); Trenton, Gibson, County, TN

Brownsville States-Graphic (Thursday); Brownsville, Haywood County, TN; Albrecht Newspapers, Inc.

<u>The Bolivar Bulletin-Times</u> (Wednesday); Bolivar, Hardeman County, TN; Delphos Herald, Inc.

The Lauderdale County Enterprise (Thursday); Ripley, Lauderdale County, TN

The Lauderdale Voice (Wednesday); Ripley, Lauderdale County, TN

Halls Graphic (Wednesday); Halls, Lauderdale County, TN

Independent Appeal (Wednesday); Selmer, McNairy County, TN

Shelby Sun Times (Thursday); Shelby, Shelby County, TN; Times Publishing, Inc.

The Bartlett Express (Thursday); Bartlett, Shelby County, TN; Dixie Publication

Germantown News (Thursday); Germantown, Shelby County, TN

The Collierville Herald (Thursday); Collierville, Shelby County, TN

<u>Independent</u> (Thursday); Collierville-Germantown, Shelby County, TN; Shoppers Press of Memphis

Cordova Beacon (Thursday); Cordova, Shelby County, TN; Dixie Publication

The Millington Star (Wednesday); Millington, Shelby County, TN; Community Newspaper Holdings, Inc.

The Covington Leader (Wednesday); Covington, Tipton County, TN

DAVENPORT (IA)-MOLINE-ROCK ISLAND (IL) DMA NO. 90

TELEVISION

Number of television stations: 7

Number of granted construction permits: 0

Owners within this market:

Black Hawk College Citadel Communications Co., Ltd. Grant Communications, Inc. The New York Times Young Broadcasting, Inc.

RADIO

Number of radio stations and radio construction permits: 54

Owners within this market, excluding those that also own television stations:

American Family Association

American Family Radio

Augustana College

Clear Channel Communications, Inc.

Connoisseur Communications

Carroll County Communications, Inc.

Cumulus Media Inc.

Jacor Communications, Inc.

John M. Giannettino

KILJ, Inc.

Knox College

KROS Broadcasting, Inc.

Galesburg Broadcasting Co.

Maquoketa Broadcasting Co.

Moody Bible Institute of Chicago

Northern Illinois University

Pritchard Broadcasting Company

Quad City Minority Broadcasting

Segue Communications, Inc.

St. Ambrose University

Studstill Broadcasting

WPW Broadcasting. Inc.

Western Illinois Broadcasting Co.

Withers Broadcasting Co.

WZOE Inc.

CABLE

Cable penetration: 68%

SATELLITE

Satellite penetration: 17.48% (State of Illinois); 23.28% (State of Iowa)

NEWSPAPERS

Newspapers within this market (by county); with parent companies when available:

Clinton Herald; Clinton, Clinton County, IA; Community Newspaper Holdings, Inc.

The Hawk Eye; Burlington, Des Moines County, IA; Harris Enterprises, Inc.

<u>Telegraph Herald</u>; Dubuque, IA-East Dubuque, IL, Dubuque County, IA, and Jo Daviess County, IL: Woodward Communications. Inc.

Mt. Pleasant News; Mt. Pleasant, Henry County, IA; Inland Industries, Inc.

Muscatine Journal; Muscatine, Muscatine County, IA; Lee Enterprises, Inc.

Quad-City Times; Davenport-Bettendorf, Scott County, IA; Lee Enterprises, Inc.

News-Tribune; La Salle-Peru-Oglesby-Spring Valley, Benton & La Salle Counties, IL

Star-Courier; Kewanee, Henry County, IL; Liberty Publishing

The Register-Mail; Galesburg, Knox County, IL; Copley Press, Inc.

The Dispatch; Moline-East Moline, Rock Island County, IL; Small Newspaper, Inc.

The Rock Island Argus; Rock Island, Rock Island County, IL; Small Newspaper, Inc.

Daily Review Atlas; Monmouth, Warren County, IL; Liberty Publishing

The Daily Gazette: Sterling-Rock Falls, Whiteside County, IL; Shaw Newspapers

Weekly publications within this market (by county); with parent companies when available:

The DeWitt Observer (Wednesday, Saturday); DeWitt, Clinton County, IA

Mediapolis News (Thursday); Mediapolis, Des Moines County, IA

<u>Des Moines County News</u> (Thursday); West Burlington-Danville-Middletown, Des Moines County, IA; Louisa Publishing County, Ltd.

New London Journal (Thursday); New London, Henry County, IA; Louisa Publishing Co., Ltd.

Winfield Beacon/Wayland News (Thursday); Winfield-Wayland, Henry County, IA Bellevue Herald-Leader (Thursday); Bellevue, Jackson County, IA; Maquoketa

Newspapers

Maquoketa Sentinel-Press (Wednesday, Saturday); Maqouketa, Jackson County, IA;

Maquoketa Newspapers

Columbus Gazette (Wednesday); Columbus Junction, Louisa County, IA; Inland Industries, Inc.

Wapello Republican (Thursday); Wapello, Louisa County, IA; Louisa Publishing Co., Ltd.

Morning Sun News-Herald (Thursday); Morning Sun, Louisa County, IA; Louisa Publishing Co., Ltd.

West Liberty Index (Thursday); West Liberty, Muscatine County, IA; Slechta Communications, Inc.

Wilton-Durant Advocate News (Thursday); Wilton-Durant-Moscow-Stockton, Muscatine County, IA

Leader (Wednesday); Davenport, Scott County, IA

The North Scott Press (Wednesday); Eldridge, Scott County, IA

Bureau County Republican (Tuesday, Thursday, Saturday); Princeton-Spring Valley,

Bureau County, IL; Shaw Newspapers

Sheffield Bulletin (Thursday); Sheffield, Bureau County, IL

The Walnut Leader (Monday); Walnut, Bureau County, IL

Carroll County Review (Wednesday); Thomson, Carroll County, IL

Prairie Advocate (Wednesday); Savanna, Carroll County, IL

Mirror-Democrat (Wednesday); Mt. Carroll, Carroll County, IL

Salem Times-Commoner (Monday, Wednesday, Friday); Salem, Carroll County, IL

Savanna Times-Journal (Thursday); Savanna, Carroll County, IL

Dallas City Enterprise (Thursday); Dallas City, Henderson County, IL

The Henderson County Quill (Wednesday); Stronghurst, Henderson County, IL; Hancock-Henderson Quill, Inc.

Atkinson Annawan News (Thursday); Atkinson, Henry County, IL

<u>Cambridge Chronicle</u> (Thursday); Cambridge, Henry County, IL; Liberty Publishing Group

Galva News (Wednesday); Galva, Henry County, IL

Geneseo Republic (Friday); Geneseo, Henry County, IL; Terry Newspapers

The Galena Gazette (Wednesday); Galena, Jo Daviess County, IL

The Galesburg Post (Wednesday); Galesburg, Knox County, IL; Galesburg Post Publishing Co.

The Times Record (Wednesday); Aledo, Mercer County, IL

The Review (Wednesday); Erie, Rock Island County, IL; WNS Publications

Roseville Independent (Thursday); Roseville, Warren County, IL

The Fulton Journal (Wednesday); Fulton-Albany, Whiteside County, IL

Prophetstown Echo (Tuesday); Prophetstown, Whiteside County, IL

Whiteside News Sentinel (Tuesday); Morrison, Whiteside County, IL

NORFOLK-PORTSMOUTH-NEWPORT NEWS DMA NO. 41

TELEVISION

Number of television stations: 9

Number of granted construction permits: 0

Owners within this market:

Beach 43 Corp.

Belo Corp.

Danbeth Communications, Inc.

Hampton Roads Educational Telecommunications Association, Inc.

LIN Television Corp.

Paxson Communications Corp.

Sinclair Broadcast Group, Inc.

The New York Times

Viacom International, Inc.

RADIO

Number of radio stations and radio construction permits: 76

Owners within this market, excluding those that also own television stations:

American Family Radio

Barnstable Broadcasting, Inc.

Baker Family Stations

Be-More Broadcasting Co

Bible Broadcasting Network, Inc.

Board of Trustees / UNC at Chapel Hill

Chesapeake Bay Broadcasting LLC

Chesapeake-Portsmouth Broadcasting Corp.

Chesapeake School Board

Chincoteague Broadcasting Corp.

Clear Channel Communications, Inc.

College of William & Mary

Commonwealth Radio, L.L.C.

Creative Educational Media Corp., Inc.

Delmarva Educational Association

East Carolina Radio, Inc.

East Carolina Radio of Elizabeth City, Inc.

Eastern Shore Radio, Inc.

Elizabeth City State University

Entercom Communications Corp.

Entercom Norfolk License, LLC

Great Scott Broadcasting

Great Sounds, Inc.

Maranatha Broadcasting Co.

Metropolitan Radio Group, Inc.

Norfolk State University Board of Visitors

OBX Broadcasting, LLC

Orbit Communications, Inc.

Pathway Christian Academy

Ronald W. Cowan, Jr.

Ray-D-O Biz Inc.

Saga Communications, Inc.

Tanya Denise Cowan

Team Broadcasting LLC

Virginia Beach Educational Broadcasting Foundation, Inc.

Virginia Faith Broadcasting, Inc.

WRCS-AM 970 Inc.

Willis Broadcasting Corp.

Willis Family Broadcasting, Inc.

WXGM Inc.

Yorktown communications Corp.

CABLE

Cable penetration: 77%

SATELLITE

Satellite penetration: 25.14% (State of Virginia); 28.76% (State of North Carolina)

NEWSPAPERS

Newspapers within this market (by county); with parent companies when available:

The Virginian-Pilot; Norfolk-Portsmouth-VA Beach-Chesapeake; LandMark

Communications, Inc.

Daily Press; Newport News-Hampton; Tribune Co.

Suffolk News-Herald; Suffolk; Boone Newspaper, Inc.

Weekly publications within this market (by county); with parent companies when available:

The Chowan Herald (Thursday); Edenton, Chowan County, NC; Cox Newspapers, Inc.

Gates County Index (Wednesday); Gatesville, Gates County, NC

The News Herald (Monday, Wednesday, Friday); Ahoskie, Hertford County, NC; Park Communications, Inc.

The Coastline Times (Tuesday, Thursday, Sunday); Manteo, Dare County, NC

Bladen Journal (Tuesday, Friday); Elizabethtown, Pasquotank County, NC; Community Newspaper Holdings, Inc.

<u>The Perquimans Weekly</u> (Thursday); Hertford, Perquimans County, NC; Cox NC Publications

Eastern Shore News (Wednesday, Saturday); Tasley, Accomack County, VA
Chincoteague Beachcomber (Wednesday); Chincoteague, Accomack County, VA
The Chesapeake Post (Friday); Chesapeake, VA; Byerly Publications, Inc.
By The Bay (Monday); Hampton-Newport News-VA Beach, VA; Boone Newspapers
The Smithfield Times (Wednesday); Smithfield, Isle of Wight County, VA
The Virginia Gazette (Wednesday, Saturday); Williamsburg, James City County, VA;
Tribune Co.

Gloucester Mathews Gazette-Journal (Thursday); Gloucester, Mathews County, VA Denbigh Gazette (Thursday); Newport News-Yorktown, VA; VA Newspapers, Inc. The Portsmouth Times (Friday); Portsmouth-Chesapeake, VA; Byerly Publications, Inc. The Tidewater News (Thursday, Sunday); Franklin, Southampton County, VA; Byerly Publications, Inc.

<u>Sussex-Surry Dispatch</u> (Wednesday); Wakefield, Surry County, VA; Chesapeake Publishing Corp.

<u>The Virginia Beach Sun</u> (Wednesday); VA Beach, VA; Byerly Publication, Inc. <u>York Town Crier</u> (Wednesday); York County, VA; VA Newspapers, Inc.

OKLAHOMA CITY DMA NO. 45

TELEVISION

Number of television stations: 12

Number of granted construction permits: 2

Owners within this market:

Hearst-Argyle Television Inc.

Griffin Entities, LLC

Locke Supply Co.

Oklahoma Educational TV Authority

Paxson Communications Corp.

Sinclair Broadcast Group, Inc.

Sullivan Broadcasting Co., III Inc.

The New York Times

Trinity Broadcasting Network

Viacom International. Inc.

RADIO

Number of radio stations and radio construction permits: 105

Owners within this market, excluding those that also own television stations:

Altus Radio, Inc.

Altus Educational Broadcasting Foundation

A.M. & P.M. Radio LLC

American Family Association

American Family Radio

Blackwell Radio, Inc.

Bott Radio Network

Chad & Shelley Fuchs

Champlin Broadcasting, Inc.

Chrisholm Trail Holding Co., Inc.

Christian Community Radio

Citadel Communications Corp.

Citizen Band Potawatomi Indian Tribe of Oklahoma, Inc.

Clear Channel Communications Inc.

Creative Educational Media Corp., Inc.

DFWU, Inc.

Dickson Radio LLC

First Choice Broadcasting, Inc.

FM 92 Broadcasters, Inc.

4M Broadcasting

Fox Broadcasting Co., Inc.

Friends Communications LLC

Fuchs Broadcasting Co.

Heritage Broadcasting

K-Love Radio Network

KPNC Broadcasting Co.

La Tremenda, Inc.

Langston University

Mahaffey Enterprises, Inc.

MM&K of Alva, Inc.

Monroe-Stephens Broadcasting, Inc.

Mur-Thom broadcasting, Inc.

Northern Oklahoma College

Oklahoma State University

One Ten Broadcast Group, Inc.

Opubco Communications, Inc.

Orion Broadcasting, Inc.

Paragon Communications, Inc.

Perry Broadcasting, Inc.

Perry Radio LLC

Ponca City Publishing Co.

RDM Broadcasting Enterprises

Renda Broadcasting Corp.

Shaffer Communications Group

Sister Sherry Lynn Foundation, Inc.

South Central Oklahoma Broadcasting & Advertising Corp.

Team Radio LLC

The Love Station, Inc.

Tyler Media Group, Inc.

University of Oklahoma

University of Central Oklahoma

Wesley Byrd & Cliff Woosley

Williams Broadcasting LLC

Woman, Handicapped Americans & Minorities for Better Broadcasting, Inc.

Wright & Wright, Inc.

Wright Broadcasting Systems, Inc.

CABLE

Cable penetration: 64%

SATELLITE

Satellite penetration: 24.19% (State of Oklahoma)

NEWSPAPERS

Newspapers within this market (by county); with parent companies when available:

Elk City Daily News; Elk City, Beckham County

The Anadarko Daily News; Anadarko, Caddo County

<u>The Norman Transcript</u>; Norman, Cleveland County; Community Newspaper Holdings, Inc.

The Clinton Daily News; Clinton, Custer County

Weatherford Daily News; Weatherford, Custer County

Enid News & Eagle; Enid, Garfield County; Community Newspaper Holdings, Inc.

<u>Pauls Valley Daily Democrat</u>; Pauls Valley, Garvin County; Community Newspaper Holdings, Inc.

The Express Star; Chikasha, Grady County; Community Newspaper Holdings, Inc.

<u>Holdenville Daily News;</u> Holdenville, Hughes County; Community Newspaper Holdings, Inc.

Blackwell Journal-Tribune; Blackwell, Kay County; Community Newspaper Holdings, Inc.

The Ponca City News; Ponca, Kay County

Guthrie News Leader; Guthrie, Logan County; Community Newspaper Holdings, Inc.

Perry Daily Journal; Perry, Noble County

The Daily Oklahoman; Oklahoma City, Oklahoma County

The Edmond Sun; Edmond, Oklahoma County; Community Newspaper Holdings, Inc.

Cushing Daily Citizen; Cushing, Payne County; Community Newspaper Holdings, Inc.

News Press; Stillwater, Payne County; Community Newspaper Holdings, Inc.

The Shawnee News-Star; Shawnee, Pottawatomie County; Morris Communications Corp./Stauffer Communications. Inc.

The Seminole Producer: Seminole, Seminole County

Alva Review-Courier; Alva, Woods County

Woodward News; Woodward, Woodward County; Community Newspaper Holdings, Inc.

Weekly publications within this market (by county); with parent companies when available:

The Cherokee Messenger & Republican (Thursday); Cherokee, Alfalfa County

The Sayre Journal (Thursday); Sayre, Beckham County; To-Co-Mo Communications, Inc.

The Sayre Record/Beckham County Democrat (Wednesday); Sayre, Beckham County

Geary Star (Thursday); Geary, Blaine & Canadian Counties

The Watonga Republican (Wednesday); Watonga, Blaine County; Town Team Newspapers

The Apache News (Thursday); Apache, Caddo County

Carnegie Herald (Wednesday); Carnegie, Caddo County

The Cyril News (Thursday); Cyril-Cement, Caddo County

Hinton Record (Thursday); Hinton, Caddo County; Town Team Newspapers

Chieftain (Thursday); Okarche, Canadian County

El Reno Tribute (Wednesday, Thursday, Sunday); El Reno, Canadian County

The Mustang News (Thursday); Mustang, Canadian County; Central Oklahoma

Newspaper Group

The Piedmont-Surrey Gazette (Thursday); Piedmont, Canadian County

The Yukon Review (Wednesday, Saturday); Yukon, Canadian County

Moore American (Friday); Moore, Cleveland County; Community Newspaper Holdings, Inc.

South Oklahoma City Leader (Wednesday); Moore, Cleveland County; Community Newspaper Holdings, Inc.

Thomas Tribune (Thursday); Thomas, Custer County

Vici Beacon News (Thursday); Vici, Dewey County

Ellis County Capital (Thursday); Arnett, Ellis County

Gage Record (Thursday); Gage, Ellis County

Northwest Oklahoman (Thursday); Shattuck, Ellis County

Covington Record (Wednesday); Covington, Garfield County

Garber-Billings News (Thursday); Garber-Billings, Garfield County

Oklahoma Hornet (Thursday); Waukomis, Garfield County

Lindsay News (Thursday); Lindsay, Garvin County

Wynnewood Gazette (Thursday); Wynnewood, Garvin County

The Rush Springs Gazette (Thursday); Rush Springs, Grady County

<u>The Tuttle Times</u> (Wednesday); Tuttle, Grady County; Community Newspaper Holdings, Inc.

<u>The Medford Patriot-Star and Grant County Journal</u> (Wednesday); Medford, Grant County; Winfield Publishing Co., Inc.

Wakita Herald (Thursday); Wakita, Grant County

The Maysville News (Thursday); Maysville, Greer County

The Granite Enterprise (Thursday); Granite, Greer County

The Mangum Star-News (Thursday); Mangum, Greer County

The Hollis News (Thursday); Hollis, Harmon County; To-Mo-Ca Communications, Inc.

Harper County Journal (Wednesday); Buffallo, Harper County; Golden Plains Publishing

Laverne Leader Tribune (Wednesday); Laverne, Harper County

The Allen Advocate (Thursday); Allen, Hughes County; Robinson-Pettis Publishing

<u>The Hughes County Times</u> (Thursday); Wetumka, Hughes County; Hughes County Publishing Co., Inc.

<u>Wewoka Daily Times</u> (Wednesday); Wewoka, Hughes County; Community Newspaper Holdings, Inc.

The Newkirk Herald Journal (Thursday); Newkirk, Kay County; Winfield Publishing Co., Inc.

The Tonkawa News (Thursday); Tonkawa, Kay County

The Hennessy Clipper (Thursday); Hennessy, Kingfisher County

<u>The Kingfisher Times & Free Press</u> (Wednesday, Sunday); Kingfisher, Kingfisher County

Kiowa County Democrat (Thursday); Snyder, Kiowa County

Lincoln County News (Thursday); Chandler, Lincoln County

The Meeker News (Thursday); Meeker, Lincoln County

Stroud American (Thursday); Stroud, Lincoln County

The Wellston News (Thursday); Wellston, Lincoln County; Oklahoma County Newspapers, Inc.

Times-Herald (Thursday); Prague, Lincoln County

Fairview Republican (Thursday); Fairview, Major County

Newcastle Pacer (Thursday); Newcastle, McClain County

Purcell Register (Thursday); Purcell, McClain County

The Davis News (Wednesday); Davis, Murray County

Sulphur Times-Democrat (Wednesday); Sulphur, Murray County

Del City Sun (Thursday); Del City, Oklahoma County

<u>The Midwest City Sun</u> (Thursday); Midwest City, Oklahoma County; Community Newspaper Holdings, Inc.

The Tribune (Thursday); Bethany, Oklahoma County; Wesner Publication Co.

The Capitol Hill Beacon (Thursday); Oklahoma City, Oklahoma County

Friday (Friday); Oklahoma City, Oklahoma County; Nichols Hills Publishing Co.

Oklahoma City Northwest News (Thursday); Oklahoma City, Oklahoma County; RDP Associates Publications, Inc.

The Oklahoma County News (Thursday); Jones-Spencer Luther, Oklahoma County; Oklahoma County Newspapers, Inc.

<u>Choctaw/Nicoma Park Free Press</u> (Thursday); Choctaw-Nicoma Park, Oklahoma County; Oklahoma County Newspapers, Inc.

<u>The Harrah Herald</u> (Thursday); Harrah, Oklahoma County; Oklahoma County Newspapers, Inc.

Perkins Journal (Thursday); Perkins, Payne County

The Yale News (Thursday); Yale, Payne County

<u>The McLoud News</u> (Thursday); McCloud, Pottawatomie County; Oklahoma County Newspapers, Inc.

Shawnee American (Friday); Shawnee, Pottawatomie County

The Shawnee Sun (Thursday); Shawnee, Pottawatomie County; County-Wide News, Inc.

The Tecumseh Countywide News (Thursday); Tecumseh, Pottawatomie County; County-Wide News, Inc.

Konawa Leader (Thursday); Konawa, Seminole County

The Cordell Beacon (Wednesday); Cordell, Washita County; Wesner Publication Co.

Sentinel Leader (Thursday); Sentinel, Washita County

Washita County Enterprise (Thursday); Corn, Washita County

<u>The Freedom Call</u> (Wednesday, Sunday); Freedom, Woods County; Community Newspaper Holdings, Inc.

Woods County Enterprise (Thursday); Waynoka, Woods County Mooreland Leader (Thursday); Mooreland, Woodward County

WILKES BARRE-SCRANTON DMA NO. 52

TELEVISION

Number of television stations: 8

Number of granted construction permits: 0

Owners within this market:

Bastet Broadcasting, Inc.
KB Communications Corp
Nexstar Broadcasting Group
Northeastern Pennsylvania Educational TV Association
Paxson Communications Corp.
Pegasus Communications Corporation
The New York Times

RADIO

Number of radio stations and radio construction permits: 92

Owners within this market, excluding those that also own television stations:

Bald Eagle Broadcast Associates, Inc.

Bloomsberg University of Pennsylvania

Brown Bear Irrevocable Common Law Trust

Cantroair Communications, Inc.

Citadel Communications Corp.

Clear Channel Communications, Inc.

Community Communications, Inc.

Covenant Broadcasting Co

Curran Communications, inc.

de Wit Broadcasting Corp.

DHRB, Inc.

DeBois Area Broadcasting Co.

East Stroudsburg University Board of Trustees/Student Activities Association

Entercom Communication Corp.

Fennessy Broadcasting Stations

 $For ever\ Broadcasting,\ Inc.$

4 Rivers Communications Broadcasting Co.

Four Rivers Community Broadcasting Co.

Gospel Media Institute, Inc.

Group 80 Inc.

H & P Communications LTD.

He's Alive, Inc.

HGF Media Group

Kings College

L.B. Radio Corp.

Lipez Broadcasting Corp.

Luzerne County Community College

Lycoming College

Maximum Impact Communications, Inc.

Milton-Lewisburg Broadcasting, Inc.

MJR Media, Inc.

Montrose Broadcasting Corp.

Multicultural Radio Broadcasting, Inc

Pennsylvania College of Technology

Pottsville Broadcasting Co., Inc.

Radio Friendz, Inc.

Sabre Communications, Inc.

Seven-Thirty Broadcasters, Inc.

Shamrock Communications, Inc.

Sinclair Broadcasting Group, Inc.

Sta Broadcasting

Starview Media, Inc.

SunAir Communications, Inc.

Sunbury Broadcasting Corp.

Susquehanna University

The Times Partner

Theodore J. Saul, Jr.

WATS Broadcasting, Inc.

Westview Communications, Inc.

Wilkes College

WMBT Broadcasting, Inc.

CABLE

Cable penetration: 82%

SATELLITE

Satellite penetration: 12.67% (State of Pennsylvania)

NEWSPAPERS

Newspapers within this market (by county); with parent companies when available:

The Evening Times; Athens-Sayre, Bradford County; Liberty Publishing

The Daily Review; Towarda, Bradford County; Times-Shamrock Communications

Times News; LeHigh-Jim Thorpe-Palmerton, Carbon County; Pencor Services

Press Enterprise; Bloomberg-Berwick, Columbia County

The Citizens' Voice; Wilkes-Barre, Luzerne County; Times-Shamrock Communications

Times Leader; Wilkes-Barre, Luzerne County; Knight Ridder

The Standard Keeper; Hazelton, Luzerne County

The Tribune; Scranton, Lackawanna County; Times-Shamrock Communications

<u>The Scranton Times</u>; Scranton, Lackawanna County; Times-Shamrock Communications <u>The Express</u>; Lock Haven-Jersey Shore, Lycoming & Clinton Counties; Ogden Newspapers, Inc.

Williamsport Sun-Gazette; Williamsport, Lycoming County; Ogden Newspapers, Inc.

<u>Pocono Record</u>; Stroudsburg-East Stroudsburg, Monroe County; Dow Jones & Company (Ottaway Newspapers, Inc.)

The Danville News; Danville, Montour County; Stauffer Media, Inc.

<u>The News-Item</u>; Shamokin-Mt. Carmel, Northumberland County; Times-Shamrock Communications

The Milton Daily Standard; Milton, Northumberland County; Liberty Publishing

The Daily Item; Sunbery, Northumberland County; Dow Jones & Company (Ottaway Newspapers, Inc.)

Pottsville Republican & Evening Herald: Pottsville, Schuvlkill County

Lewisburg Daily Journal: Lewisburg, Union County; Liberty Publishing

The Wayne Independent; Honesdale, Wayne County; Liberty Publishing

Weekly publications within this market (by county); with parent companies when available:

<u>The Rocket-Courier</u> (Thursday); Wyalusing, Bradford/Sullivan/Wyoming/ Susquehanna Counties

The Canton Independent Sentinel (Thursday); Canton, Bradford County

Troy Gazette-Register (Thursday); Troy, Bradford County

The Record (Wednesday); Caraopolis-Moon Township-Robinson Township, Clinton County; Clinton County Publishing

<u>Carbondale News</u> (Wednesday); Carbondale, Lackawanna County; Liberty Group Publishing

Abington Journal (Wednesday); Clarks Summit, Lackawanna County; Bartsen Media, Inc.

The Villager (Wednesday); Moscow-Hamlin, Lackawanna & Wayne Counties; Liberty Publishing Group

<u>Cranberry Journal</u> (Wednesday); Cranberry Township-Mars-Zelienople, Luzerne County;

Trinity Holdings, Inc. (Gateway Press)

Mountaintop Eagle (Wednesday); Mountaintop, Luzerne County

The Dallas Post (Wednesday); Dallas, Luzerne County; Bartsen Media, Inc.

Sunday Dispatch (Sunday); Pittston, Luzerne County

The Journal-Herald (Thursday); White Haven-Weatherly, Luzerne County; Journal Newspapers, Inc.

West Side Leader (Wednesday); Wilkes-Barre, Luzerne County

<u>Willow Grove Guide</u> (Wednesday); Willow Grove, Luzerne County; Montgomery Newspapers

<u>The Luminary</u> (Wednesday); Muncy-Hughesville-Montgomery, Lycoming County; Ogden Newspapers

Pocono Post (Friday); Gilbert, Monroe County; Times News, Inc.

Weekender (Wednesday); Sunbury, Northumberland County; Ottaway Newspapers, Inc.

Press-Herald (Thursday); Pine Grove, Schuylkill County; South Schuylkill Printing & Publishing

The Call (Thursday); Schuylkill Haven, Schuylkill County; South Schuylkill Printing & Publishing

<u>West Schuylkill Herald</u> (Thursday); Tower City, Schuylkill County; South Schuylkill Printing & Publishing

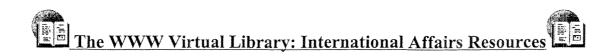
<u>Selinsgrove Times Tribune</u> (Wednesday); Sellinsgrove, Snyder County; Swank-Fowler Publications

<u>Snyder County Times</u> (Monday); Middleburg, Snyder County; Snyder County Times, Inc. The Sullivan Review (Thursday); Dushore, Sullivan County

The Forest City News (Wednesday); Forrest City, Susquehanna County

The Susquehanna County Independent (Wednesday); Montrose, Susquehanna County Susquehanna County Transcript (Wednesday); Susquehanna, Susquehanna County The News Eagle (Tuesday, Thursday, Saturday); Hawley-Lake Wallenpaupack, Wayne County

<u>The Weekly Almanac</u> (Wednesday); Honesdale, Wayne County <u>New Age-Examiner</u> (Tuesday, Friday); Tunkhannock, Wyoming County TWO LISTINGS OF INTERNET NEWS SOURCES



News Sources





News Search Engines

<u>Ananova</u>-- Search for the latest news by category, keyword, or news directory, plus e-mail alerts.

<u>Global Archive</u>, from the <u>Financial Times</u>, provides searchable access to articles from thousands of periodicals worldwide.

<u>MagPortal</u>-- Searchable daily index of free magazine articles available on the Internet, by keyword and by category.

Moreover.com-- World news headlines from 1800 sources, in more than 150 categories. Try especially the <u>Foreign Policy</u> section for international relations news, and <u>Trade News</u>. Extensive headline news choice is also available by world region. Offers customization.

NewsHub-- Thorough, searchable newsbot, with advanced options.

NewsIndex -- Search the current news, by keyword, in hundreds of sources at once.

<u>NewsTrawler</u>--A parallel search engine for news on the Internet, with articles from the archives of hundreds of online news, magazine, and journal sources from around the world, searchable by country, category, or subject.

Northern Light's Current News-- A searchable archive of real-time news from scores of continuously updated newswires.

<u>Opinion-Pages</u>-- Offers searchable "access to the most current editorials, opinions, commentaries and columnists from [hundreds of] English [language] newspapers and magazines on the World Wide Web."

Search Engine Watch lists annotated links to the chief news search engines.

<u>TotalNEWS</u>-- Search current news stories, by keyword, on this search engine and directory of news sites, plus links to newspapers worldwide.

News Sources

- ABC News International Section -- News from this major American TV network.
- Abyz News Links -- Unusually complete and current site, with links to many thousands of

newspapers and other news sources from around the world, those with news content of widespread interest.

- <u>AILEENA</u> -- Major media index, thousands of links to newspapers, radio and TV stations in scores of countries.
- <u>BBC News Online</u>-- World news from one of the most trusted sources, in print, audio, and video. Note the searchable <u>World News</u> section, and the <u>World Service Newshour</u>, in audio, for live reports on world news.
- <u>CNN Interactive--World News</u>-- World news and weather from the Cable News Network, including special editions for the main world regions. Hear live broadcasts at CNN <u>Audioselect</u>, and video at <u>Videoselect</u>. Various <u>languages</u> are available. A <u>European version</u> is available. You can personalize your news coverage at myCNN.
- <u>Canadian Broadcasting Corporation Newsworld</u>-- News from a prestigious source, with much audio and video available.
- <u>Christian Science Monitor</u>— Excellent online content from an award-winning U.S. daily with an international perspective.
- <u>Current Awareness Resources using Internet Audio and Video</u>— Compilation of links to audio/video services in English for the information professional monitoring current events. Includes numerous international sources.
- <u>Economist</u>—The outstanding global news weekly from London, with library and searchable archives. Their Global Agenda feature is a concise analysis of major international issues and events. Note the <u>Country Briefings</u>, summaries with "articles from <u>The Economist</u>, background profiles, forecasts and statistics from the Economist Intelligence Unit, market and currency updates, newswires and links," and the <u>Country Surveys</u>.
- <u>eFinancial News</u>-- Electronic edition of <u>Financial News</u>, an excellent source for European financial news.
- Environmental News Network-- Excellent for news, features, multimedia, and special reports.
- <u>EuroNews</u>-- European news and weather in several languages, from EuroNews, a European public TV network.
- <u>Financial Times</u>— The famous international business newspaper from London. Note their really useful <u>Global Archive</u>, giving searchable access to articles from thousands of periodicals worldwide. They also offer customized <u>News by E-Mail</u>, to deliver reports on topics of your interest every workday.
- <u>1stHeadlines</u>-- In addition to links to thousands of recent U. S. headlines by topic or state, you can access international headlines by country. Searchable, including by source.
- Foreign Media Reaction—Reports prepared by the U. S. Department of State, as a global round-up of editorial and opinion editorial reaction to a major foreign policy issue or event.
- ForeignWire offers international news, comment, analysis, chatroom, and a news search by

topic.

- <u>Frontpage Daily News</u>-- World news headlines and links to major international news sources and newswires.
- Global Beat—For journalists and editors who cover international issues, weekly analyses of key global security issues from research organizations, important official announcements and speeches, and documents. Has search engine and good links. From NYU's Center for War, Peace, and the News Media.
- <u>Global Security News</u>-- Summaries of and links to top news stories on security issues around the world, by region and topic, more upon paid registration.
- Inkternational News Links -- The Flying Inkpot lists online papers around the world.
- <u>InsideWorld News</u>-- "Collection of country and region web sites providing local news and information to a worldwide audience," with free daily e-mail service on country of your choice. Also offers country portals, country information, and other such links.
- <u>Institute for War & Peace Reporting</u>-- News, analysis, reports, media programs, free e-mail bulletins, and links about conflicts in Eastern Europe, the Balkans, and the Caucasus.
- International Herald Tribune-- Bills itself as "the world's daily newspaper," from Paris.
- Internet Public Library: Online Newspapers-- By country, title, or a search facility.
- <u>ISN Current World News</u>-- From the ISN project, supported by the Swiss government, with coverage focusing on security policy issues and concerns, especially in the Partnership for Peace region. Updated every weekday, and searchable through keywords or dates.
- <u>Kidon Media Link</u> lists newspapers, magazines, television and radio news stations, and news agencies.
- KIOSKEN-- One of the very best and complete sets of links to news media worldwide.
- <u>Le Monde Diplomatique</u>-- World-renown, mostly in French, some English available (at ''edition en anglais''), with searchable archives.
- <u>Lists of Newspaper and Periodical Resources on the Internet</u>, from the United States Library of Congress.
- <u>Media Links</u>-- From <u>Editor & Publisher</u>, a really complete full service and global coverage of online newspapers, magazines, news services, radio and television stations, association listings, and city guides.
- <u>Media and Peace Institute</u>—<u>Excellent</u> portal site on this topic, from the U.N.'s University for Peace, specializing in the interactions among media, conflict, peace, and security, with a wealth of news, analysis, documents, and links, including for current conflicts.
- MetaGrid-- Directory for thousands of newspapers and magazines online, by topic, country, or region.

- <u>Mundo Latino</u> has hundreds of links to the Spanish-language press in a virtual newsstand, by country, as well as hundreds of links to periodicals in other languages.
- <u>NewsCenter</u>-- "Up to the minute news resources," from Librarian Gary Price, George Washington University, lists links to a wide variety of news sources, by source, location (including international), and topic.
- <u>NewsDirectory.com</u>-- A guide to English-language media online, worldwide--newspapers, magazines, TV, others.
- News Link-- Links to thousands of newspapers, magazines, radio and TV stations, and news services around the world.
- <u>Newspaper Links</u>— From the Newspaper Association of America, links to online newspapers around the world.
- Newspapers Online!-- Worldwide listings by type and country.
- Newspapers of the World on the Internet-- Covers newspapers worldwide, organized by region.
- Newsrack-- Links to periodicals worldwide, from the U.K.'s John Menzies newstand chain.
- New York Times—Fine international section, free sign-up the first time, searchable. Note the College Times
- Web Site, with features (some international) for students and faculty.
- Online Intelligence Project-- International news, commerce, and references, oriented by topic and region.
- Online Newspapers.com-- A global listing of thousands, by country, from Web Wombat, an Australian search engine.
- Paperboy -- Thousands of links, by prestige, country, news agency, audio, special topics.
- Radio Free Europe/Radio Liberty Newsline-- "Daily report of developments in Eastern Europe, Russia, the Caucasus and Central Asia, based on news gathered by the correspondents, services and regional specialists of Radio Free Europe/Radio Liberty."
- Reuters-- Top world and business news stories from this prestigious agency.
- <u>Selected English-Language Newspapers Online</u>-- An easy-to-use global sampling from the Spire Project.
- <u>7am.com</u>-- A widely syndicated web-based news service from New Zealand, with US, UK, Australia, New Zealand, India, and Japan newswire feeds online.
- Sympatico News Express-- Links Canadian and world newspapers and magazines online.
- <u>Ultimate Collection of News Links</u> by PPPP.net lists thousands of sources, by continent.

- <u>Voice of America News</u>-- News and special reports, printed and audio (in scores of languages), from this U.S. government international service.
- <u>Washington Post World Section</u>— With regional news pages, and searchable by countries, topics, or keywords. Interactive maps. Also check out the <u>Search the World</u> page for access by country and other features.
- World Headlines-- Excellent for top news globally, with searches by region, country, topic, or media links.
- <u>WorldNews.com</u>-- Searchable and archived news from a global news service, by country, leading sources (printed and audio), or topic, in several languages.
- <u>World News Network</u>-- <u>Excellent</u>, highly-rated directory of links to major online news sources worldwide (including specialized ones), mainly those in English, by region, country, and topics of coverage.
- <u>Yahoo!</u> provides "World Full Coverage" of major events, by region, with related links and search facility, plus international news on regional versions of Yahoo!. Enter your country or topic in "Search Full Coverage" for a search.
- Zona Europa: The European Media Site-- Covers all types of media in Europe, with numerous links to European media resources.
- <u>Zona Latina</u>: The Latin American Media Site-- Covers all types of media and advertising in Latin America, with research data, photographs, event schedules, directories, book reviews, and numerous links to Latin American media resources.



Last updated on Monday, November 12,th 2001.
This directory is edited and maintained by
Professor Wayne A. Selcher

***** MEDIA SOURCES in the U.S.A. *****



Newspapers, News magazines, News agencies, Radio & TV Stations

- A&E Television Network
- ABC-TV News
- American Freedom News
- AJR News Link Newspapers, Magazines, Radio & TV
- Bloomberg Top World News
- Breaking News 7am.com
- Break Point A Christian Perspective on the News
- Capitol Hill Blue
- CBS-TV News
- CNET Today Technology News
- CNN
- Congress Action Newsletter
- C-SPAN
- Discovery Channel Online
- Drudge Report
- Enews.com the Ultimate Magazine Site
- Fox News
- Genesis Communication Network
- Global Preparedness News & Intelligence Analysis
- ID Media Exposing Corruption
- IGC EcoNet
- INFOWARS
- Last Days Journal
- Laura Lee Show
- Los Angeles Times
- Lycos Environment News
- Maranatha Christian Journal
- Maryland News Network
- Media Bypass The Uncensored National News
- Media Filter Tactical Media in Perspective
- Media Research Center
- MIT List of Radio Stations on the Internet

- MSNBC News
- NBC-TV News
- News York Times
- National Public Radio
- NewsMax America's News Page
- Newswatch Magazine
- Newsweek Magazine
- Online News Hour
- Online News Hour Uncovered News
- PBS Online
- Perspective on the News
- Reader's Digest World
- Roll Call Online
- SCAN TV
- Slate Magazine
- Talkers Magazine
- The Associated Press
- The Big Eye Alternative News Center
- The Communion Homepage
- The Cutting Edge
- The Nando Times
- The Nation
- The Washington Times
- The World Out There
- Time Magazine
- TLC The Learning Channel
- Tom Paine Commonon Sense
- Total News
- TV News Archive
- U.S. News & World Report
- <u>U.S. Newspapers Online</u>
- UPI United Press International
- USA Today
- VOA Voice of America
- Wall Street Journal
- Washington Post
- Wired News
- World Harvest Radio International
- · World Net Daily
- WWCR Shortwave

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- CANADIAN MEDIA SOURCES
- INTERNATIONAL MEDIA SOURCES
- **INTERNATIONAL NEWS MEDIA LINKS**

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***** INTERNATIONAL MEDIA SOURCES *****



Newspapers, News magazines, News agencies, Radio & TV Stations

- AFP Worldwide News Agency
- Africa Intelligence
- Africa News on the World Wide Web
- Al Bawaba Middle East News
- Arab World Online
- Arutz Sheva Israel National Radio
- Asahi Newspaper English
- · AsiaNow Asiaweek Home
- Asia Now Time Asia Home
- Bahrain Tribune Daily Newspaper
- Bangkok Post
- BBC Online Homepage
- BBC World Service
- B'tzedek Journal Internet Edition
- Changing Times The Times & The Sunday Times
- Channel Africa Main Index
- Central Europe Online Homepage
- China Central Television
- China Times Taipei (English news)
- CNN International Asia Pacific
- Costa Blanca News Spain
- CPJ Press Freedom Online
- Daily News (Sri Lanka)
- Dawn (Pakistan)
- Egypt Magazine
- Electronic Telegraph (UK)
- ETA Online News in English
- Far Eastern Economic Review
- Federal News Service
- Financial Times
- Greek News (in English)
- Gulf Daily News Bahrain

- Independent Online
- India World
- Inside China Today
- Intelligence Online
- Interfax International Group
- International Herald Tribune
- Islamic Republic Wire
- Jane's Information Group News
- Jane's Intelligence Review
- Jewish World Review
- Korean Central News Agency
- Kyodo News Web
- Le Monde
- Net Iran
- · News from Israel and the Jewish World
- 1 World Communication
- One World Net
- Radio Free Europe Radio Liberty
- RFE/RL Newsline Eastern Europe, Russia, Central Asia
- Russia Today
- Salam Iran Homepage, Tehran Times
- Sky News, Sports, Entertainment
- South China Morning Post Hong Kong
- Sydney Morning Herald
- The Age (Melbourne)
- The Australian
- The Economist
- The Independent (Bangladesh)
- The Irish Times
- The Japan Times
- The Jerusalem Post
- The Latest News
- The Moscow Times
- The News France's English Language Newspaper
- The Saigon Times Daily
- The St. Petersburg Times
- The Star (Malaysia)
- The Week in Germany
- The World Paper
- Turkish Daily News
- Venezuela Online News
- World Magazine World on the Web
- Yonhap News English Service
- ZNet

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DECLARATION OF THOMAS J. BARTUNEK

DECLARATION OF THOMAS J. BARTUNEK

I am the General Manager of radio stations WQEW(AM) and WQXR·FM, New York, New York, which have been owned by The New York Times Company ("The Times") since 1944. I have held my present position since 1998, and before then served in other staff positions at the stations from 1990. The programming for Station WQEW(AM) is presently provided by Radio Disney, a division of ABC Radio, under a Time Brokerage Agreement, and that station provides a children's programming service. Station WQXR·FM ("WQXR"), to which the bulk of my duties pertain, has been a classical music format station since its inception.

I have been advised that The New York Times Company's ownership of its New York radio stations and *The New York Times* newspaper is "grandfathered" because it existed prior to the FCC's prohibition on cross ownership of media in a single market. I can attest to the fact that our common ownership with this prestigious newspaper, and our consequent access to its extraordinary staff of reporters and commentators with preeminent expertise in a broad spectrum of local, national and international subject areas, is directly responsible for many of the programming services provided by WQXR. While WQXR's format is primarily classical music, it also broadcasts news and a wide variety of features and commentaries about topics in the news, the arts, science and technology, books, restaurants, the theater, and similar subjects of particular interest to our listeners—virtually all of which are written, or written and delivered on the air, by *Times* staff members.

The roster of features and commentaries on the air at any given time changes, but in a typical week we broadcast between five and ten daily features, and one or two weekly features. "The Front Page Preview," for example, is a summary of the stories being considered for the front page of the following morning's New York Times, and is written by Times reporter James Barron.

Another daily program, "Washington Report," is a morning commentary by reporters and columnists from the newspaper's Washington Bureau. Other current commentaries and features written or written and presented by Times staffers include "Inside the New York Times Book Review" (written by Book Review editor Charles McGrath or his designate), "Art and Antiques" (Rita Reif), "Restaurant Times" (both William Grimes and Eric Asimov), "The New York Times on Theater" (Lawrence Van Gelder, Peter Marks, Bruce Webber), and "Design of the Times" (Julie Iovine).

In the recent past, we have presented commentaries and features such as "On the Trail" (reports from the presidential campaign from Peter Marks), "Health Times" (Cornelia Dean), "Sports of the Times" (first Joe Durso, then Richard Sandomir), "Circuits" (derived from the newspaper's special section, first with Peter Lewis and then Henry Fountain), and "The Advertising News" (first with Phil Dougherty, most recently with Stuart Elliott). Indeed, in the early days of New York Times Company ownership, WQXR presented regular commentaries from then Managing Editor Clifton Daniel.

It is highly unlikely that we would have been able to offer our listeners these commentaries and features were our station not owned by The New York Times Company. The *Times* has strongly encouraged its staffers to participate in our projects—sometimes during the recruitment process—and has made them available to us in ways that would simply not have happened if our station and the newspaper were competing, separately owned entities. Common ownership also affords us and our listeners an assurance of continuity: Several of the commentaries and features have had many hosts through the years, as reporters and columnists come and go from the paper, but key topic areas are always covered by an exceptional professional. That permits us to plan and to commit resources to an extent that would not be possible were we dealing with unrelated third parties. Finally, the fact that our station and the newspaper share a common culture and a set of values, based on a shared tradition of journalistic and programming integrity, permits us to resolve sensitive content issues far more easily than would be the case with unrelated third parties.

Common ownership also produces efficiencies for our station that lower our costs, thus reducing pressure on advertising rates and freeing up more resources for our programming efforts. Our costs for obtaining and administering employee health and retirement benefits, for example, are lower than would be the case if the station were required to obtain and administer equivalent benefits on its own. We also benefit from the Company's cash management, its stock purchase plan, and from the Company's wide ranging employee relations efforts—such as training and

admission to cultural institutions (all of which help in our own employee recruitment and retention) and from the "halo" effect that results from our formal relationship with such an important New York institution. There are also many cross-promotional benefits between the station and the newspaper that create value for each. In addition, WQXR is able to use proprietary market research data developed by the newspaper for its own strategic planning. Finally, because our audiences are so similar in demographic and psychographic characteristics, our separate sales staffs are able to create joint presentations for clients who want to reach that audience with increased efficiency.

The listening public is the ultimate beneficiary of these efficiencies and of our close content relationship with The Times. Because we are owned by The Times, we are able to program and broadcast commentaries and features that would otherwise be unavailable to us, and which are unavailable to listeners on any other radio station. Our common ownership and our corporate culture encourage us to seek new and better ways to work together to improve our service to our audience.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Monias J. Bartunek

[Date]

WAS1 #1031186 v1

DECLARATION OF DIANE H. MCFARLIN

DECLARATION OF DIANE H. MCFARLIN

I am the Publisher and Executive Editor of the Sarasota Herald-Tribune, ("Herald-Tribune") which is published in Sarasota, Florida. The Herald-Tribune is wholly owned by The New York Times Company ("The Times"). I have been employed by the company since 1982. I have held my present position since November 1999. Since July 1995, I have also been responsible for the operation of a 24-hour cable news channel ("SNN6") that is currently carried on the Comcast cable systems that serve Sarasota and Charlotte Counties and a small portion of Manatee County, Florida. The Times has no television stations serving this market, but most of what I have to say in this statement about the public benefits of our joint operation of the Herald-Tribune and SNN6 would apply equally to a joint news effort by a newspaper and a television station in the same market.

The Herald-Tribune is solely responsible for producing and presenting all of SNN6's news programming. SNN6 cablecasts the news in the form of successive thirty-minute programs, 24 hours each day. These programs are continuously updated throughout the day and night so that, by the evening of a typical weekday, the news content of one of our thirty-minute programs has become largely different from the content of a similar thirty-minute segment earlier in the day.

SNN6 has achieved a high level of viewership among Comcast viewers. SNN6 was delivered in 2000 to 197,000 Comcast cable households. Among such households in Sarasota County, The Media Audit 2000, an audience research

organization, found that SNN6 was viewed by 77,000 persons per day and 131,000 persons per week. The number of Sarasota County viewers watching SNN6 each day was second only to the number viewing the Weather Channel each day and exceeded the daily number of persons that viewed any other Comcast-offered cable channel, including CNN, MSNBC, CNBC, ESPN, ESPN 2 and CNN Headline News. On a weekly basis, the number of persons viewing SNN6 news over a seven-day period (131,000) exceeded the number of persons viewing the next most viewed television broadcast station each week (80,000 persons) by more than 60%.

The reason that SNN6 has been able to achieve these viewing levels is that we present a first-rate, locally oriented news product. If it were not for our common ownership of the Herald-Tribune and SNN6, it would be impossible for us to do so. Without the Herald-Tribune, SNN6 could not create the <u>quantity</u> of original news programming that it does or to achieve its high level of news <u>quality</u>. This is because there are substantial synergies and efficiencies resulting from common ownership that benefit both the Herald-Tribune and SNN6.

I start with the fact that a daily newspaper such as the Herald-Tribune is in the full-time business of providing a news service for the specific community it serves, which necessarily requires us to be closely involved in the life of our community on a day-to-day basis. Thus, while the Herald-Tribune does include national and international news provided by wire services, our primary focus must be on the needs and interests of Sarasota and its surrounding area. Our fundamental print news business provides an essential base for SNN6's operations.

To this base we have added approximately 40 persons specifically employed by SNN6 -- eight in sales and the rest in news and production.

The primary area of convergence between the Herald-Tribune and SNN6 is in the news gathering process. We have a single unified newsroom for both operations, staffed by general and specialist reporters, and we hold joint news meetings there. All of our news personnel are subject to the same high ethical and journalistic standards that flow from being a part of The Times. Reporters for the Herald-Tribune and SNN6 share news tips, sources, background information and the substance of the news stories they obtain. Herald-Tribune reporters frequently provide some of the written material used by our on-air SNN6 anchors and reporters. SNN6's on-air production and presentation of the news requires a different set of skills from print reporting and Herald-Tribune print reporters only occasionally serve directly in those roles. Herald-Tribune reporters are, however, frequently interviewed on SNN6 about news stories they have covered and this provides an additional and important dimension to our news service.

There are also substantial cross-benefits and efficiencies created by a newspaper/TV or newspaper/cable operation. Most of our employees operate under one roof and under a single general and administrative staff. The Herald-Tribune promotes SNN6 and SNN6 promotes the newspaper. As a result, many people tune into SNN6 because of something they have read in the Herald-Tribune and many people look to the Herald-Tribune for more information about something they have seen on SNN6. Although advertisers usually purchase advertisements in the

Herald-Tribune and on SNN6 for different purposes and to target different readers or viewers, we make an effort to sell the two in combination (and in combination with our Web site) as complementary advertising buys that can efficiently be made with a single purchase. All of these efficiencies also permit us to devote even greater resources to our essential mission, which is gathering and presenting news and information to the public.

Our partnership with Comcast has worked well, but we enjoy at least three advantages that are not typically shared by newspapers trying to enter into a similar arrangement with a cable operator. First, Comcast is the exclusive cable provider in Sarasota and Charlotte Counties and achieves approximately 80% penetration in those counties. In many other markets, cable ownership is far more fragmented and many systems are not interconnected. Indeed, even in our case, we are unable to reach nearly as many potential viewers as we would, for example, if our news service were to be broadcast by a post-DTV-transition television station offering a 24-hour news service as one portion of its digital transmission to an extensive service area. Second, our contract with Comcast is for an unusually long period, 10 years, although even our agreement affords Comcast the opportunity to terminate or change its per-subscriber payments to us at earlier dates under various circumstances. Arms length agreements between newspapers and cable operators -- particularly shorter term agreements -- present obvious inhibitions to long-term investment in a news channel by a newspaper. (SNN6 is just now approaching profitability for us, after six years of operation.) In contrast, a news

service provided by a television station under common ownership with a newspaper in the same market would not be faced with a similar constraint. And finally, our Comcast agreement permits us to be solely responsible for the content of the news channel, so we are not faced with problems of conflicting cultures that can arise when there are shared responsibilities.

In sum, SNN6 is a far better video news service because it is under the same ownership as the Herald-Tribune. The advantages to the public on common ownership would be even greater in the case of a newspaper and a local television station, both with respect to the type of local news programs currently being broadcast by most analog television stations and with respect to potential full-time news channels that will in the future almost certainly be offered as one program service of a digital television station.

I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

Diane H. McFarlin

11-23-01 (Date)

DECLARATION OF CYNTHIA H. AUGUSTINE

DECLARATION OF CYNTHIA H. AUGUSTINE

I am the President of The New York Times Broadcast Group. I am responsible for operations of eight television stations and two radio stations licensed to subsidiaries of The New York Times Company ("The Times"). Our television stations are located in Memphis, Tennessee; Scranton, Pennsylvania; Moline, Illinois; Huntsville, Alabama; Fort Smith, Arkansas; Norfolk, Virginia; Des Moines; Iowa and Oklahoma City, Oklahoma. Our radio stations are located in New York City, where their common ownership is "grandfathered" from a time prior to adoption of the newspaper/broadcast cross-ownership rule. The Times also owns The New York Times newspaper, the Boston Globe newspaper, and 15 other newspapers in various regions of the country.

In a separate statement being submitted concurrently with this one, the General Manager of WQXR-FM, our New York City radio station, is providing detailed information concerning public benefits that are produced by common ownership of that station and The New York Times newspaper in New York City. In another separate statement, the Publisher of the Sarasota Herald-Tribune, a daily newspaper owned by The Times, is providing additional information as to how joint operation of that newspaper and a local 24-hour cable news channel serving much of the newspaper's market has enabled the Herald-Tribune to provide a far better cable news service than would have been possible without joint ownership of the newspaper and the cable news channel.

Under the present rules, we are not permitted to own any newspapers within the Grade A contours of our eight television stations, nor may we acquire a television station placing a Grade A signal over any community in which The Times publishes a newspaper. We have, however, attempted to enter into cooperative arrangements with non-owned newspapers and cable systems in several of our television markets. For example:

In the Moline-Rock Island Davenport television market, we cooperate with the Small Newspaper Group, which publishes one of the two largest daily newspapers and one weekly newspaper in the Quad-Cities area. Our station and the newspaper share news budgets and story lists, undertake joint news and public service projects, and utilize each other's reporters for news gathering, writing and (to a limited extent) news presentation. This type of cooperation produces tangible public benefits. Joint projects of the newspaper and our station have included, for example, the award-winning "To Russia With Love," a series covering Quad City visitors to Russian orphanages; "Corn or Concrete," also award-winning, in which the advantages and disadvantages of economic development and expansion in previously rural areas were explored; and "The Great American Toy Test," a series that helped parents rate the quality of new toy offerings near the holidays.

In Oklahoma City, our television station, KFOR-TV, operates under a similar informal news sharing and cooperation arrangement with <u>The Journal Record</u>, the metropolitan area's business publication of record, and another newspaper under the same ownership that serves the Tinker Air Force Base.

For example, KFOR-TV produces a business segment for its morning news broadcasts each weekday utilizing content from <u>The Journal Record</u> and each the newspaper and station cross-promote each other. We have similar sharing arrangements with other area newspapers for specific types of information such as weather.

Most recently, our Memphis station, WREG-TV, has entered into a trial broadcast/ print/web convergence partnership with <u>TheCommercial Appeal</u>, a Memphis daily newspaper. Under this agreement, the station and newspaper will share news reports, features and certain special projects. The newspaper will, for example, work with the station to provide columnists and journalists for inclusion, where appropriate, in WREG-TV newscasts, and the station will use its weather news resources to provide content for The Commercial Appeal.

In the Memphis, Fort Smith and Scranton television markets, our stations have entered into agreements with local cable operators under which the stations program 24-hour cable news channels:

-- In Memphis, the cable news channel rebroadcasts the news programming of our station, WREG-TV, and also broadcasts live, breaking news events and emergency weather information originated on WREG-TV. The cable news channel creates some original programming, such as town hall meetings on education funding and reform, live viewer forums on education, political debates, programs dealing with energy conservation and with children's issues, and local sports and consumer

programming. The cable news channel also translates WREG-TV's early local news into Spanish for the growing Hispanic population in Memphis.

-- In Fort Smith, station KFSM-TV has provided a 24 hour local news cable channel since 1996. The cable news channel is used primarily to provide time diversity for KFSM-TV's newscasts. On occasion, however, the cable news channel provides separate programming. During the recent election campaign, for example, the news channel broadcast two live political debates between candidates for a vacant Third District congressional seat at a time when KFSM-TV was carrying CBS network reports surrounding the recent terrorist attacks.

-- Our station in Scranton also operates a 24 hour news channel carried by the Adelphia cable systems, which serve approximately 15% of the market's television households. It is devoted primarily to simultaneous and repeated newscasts originated at our station, WNEP-TV, continuous local weather information in one quadrant of the screen, local public service announcements in another quadrant of the screen, and occasional original news programming. This service is provided pursuant to a cable retransmission consent agreement that expires August 31, 2002.

We shall continue to develop cooperative arrangements such as those described above where that is feasible and we shall continue to work with our existing partners so that we can each provide the best service possible to the public in the markets in which we have existing arrangements. There are,

however, substantial constraints on the service we can provide under such unrelated third party arrangements.

First, all such arrangements are either informal or time-limited pursuant to specific contractual agreements. (Some of the arrangements exist under retransmission consent agreements with cable operators.) Under such conditions, we are limited in the resources we can prudently commit on a long-term basis and in the long term strategic planning we can do to maximize the service we will provide. Our Sarasota cable news channel, for example, has taken six years to reach a point at which we believe it will be profitable next year. We could not do what we have done there under a short-term agreement.

Second, none of our existing arrangements permits us to provide additional or enhanced services to an entire television market. The Memphis cable news channel, for example, is carried in fewer than one-third of the television households in the Memphis DMA.

Third, technology can be a difficult problem when two independent organizations seek to operate cooperatively. Today's television and newspaper news rooms both operate with highly sophisticated and expensive electronic infrastructures. It can be very difficult for two separate business entities with differing strategy for capital investment to agree on the particular investments to be made in their separate news rooms, particularly under short-term cooperation agreements. The electronic exchange of pictures and text news materials has been a constant struggle in newspaper/television convergence efforts.

Finally, but not least, different companies inevitably operate under their own unique cultures and internal standards. Even assuming the best of will on the part of each party, joint operations on a day-to-day basis under these conditions present inevitable difficulties, particularly when there is no clear agreement that one party to an arrangement is to have primary responsibility for a news operation.

At The New York Times Broadcast Group, we believe strongly that common ownership of a newspaper and television station in the same market will permit both the station and the newspaper to provide a significantly enhanced service to the public. Our experience in New York with WQXR and our experience in Sarasota (where our newspaper has sole responsibility for a cable news channel serving a very large portion of the newspaper service area) has shown us that joint ownership does indeed result in real benefits to the public. In New York, our newspaper permits WQXR-FM to provide the many additional program features described in Mr. Bartunek's separate Declaration. In Sarasota the combined resources of the Herald-Tribune and our cable channel staff enable us to deliver a superior local cable news channel service that is relied on by cable viewers as a primary news source, as described in Ms. McFarlin's separate Declaration.

The same synergies and efficiencies should be achievable in our television markets and in The Times's other newspaper markets. Using the combined staffs of a newspaper and a television station, we will not only be able to increase our joint news gathering capacity, but to optimize our use of

the unique attributes of each medium -- a newspaper's in-depth news gathering resources, including a greater number of specialist reporters and its ability to present news in far greater detail, and the mass audience reach and special visual appeal of television. In addition to this more efficient use of combined resources, we would also have the ability to do coordinated long-term planning; we could have coordinated compatible technology; and we would share a common internal culture. Taken together, these factors will permit both our television stations and our newspapers to do a better job than either could alone in fulfilling their common essential mission, which is to provide the highest possible news and information services to their viewers and readers. We look forward, for example, to a time when we may be able to provide a 24hour local news service as one portion of the digital transmission services that each of our stations will provide to its entire DMA.

Cynthia H. Augustine

Mev. 27, 2001

Date

STATEMENT OF JAMES BELOYIANIS

STATEMENT OF JAMES BELOYIANIS

I am the President of Katz Television Group, a subsidiary of Katz Media Group. The Katz Television Group is a "national spot rep" for television stations, which is to say that we are in the business of selling national spot advertising for a number of different television station clients. National spot advertising consists of spots national advertisers place directly on local television stations, as contrasted with other national television advertising that advertisers buy on television or cable networks. Other Katz subsidiaries sell national spot advertising on radio and on cable.

I joined the Katz organization in 1973 and have been a television national spot rep for Katz continuously since then. I thus have twenty-eight years of day-to-day experience in selling television national spot advertising. One of our clients is The New York Times Broadcast Group, which operates eight television stations. Other television clients include a majority of the stations owned by Hearst-Argyle and by Scripps-Howard.

In seeking to sell national spot advertising for specific television stations, we compete for advertising dollars primarily with television and cable networks, to a much lesser extent with radio networks and stations, to a small extent with Internet advertising, and, of course, we compete with those seeking to sell national spots for other television stations. In my experience, I have never been in a situation in which I felt that I was competing with newspapers for national advertising dollars.

To the extent national advertising is placed in newspapers, that advertising comes from totally separate budgets from the budgets national advertisers have for television advertising. I believe that this reflects different objectives advertisers hope to achieve through these different media. Television is best at depicting sight, sound, motion and feelings and for conveying striking visual images. Newspaper advertising, on the other hand, has greater residual value and can offer far more detail concerning products and pricing. An advertiser using these two forms of media can thus appeal to the same audience in complementary ways or may seek to reach the somewhat different audiences who comprise television viewers and who comprise newspaper readers. Whatever the reason, my consistent experience has been that it is not a productive use of our time on the national level to try and divert newspaper advertising dollars to national spot television.

James Beloyianis

(Date)

WAS1 #1023937 v1

Attachment 7

DECLARATION OF KENNETH A. SOSSAMAN

DECLARATION OF KENNETH A. SOSSAMAN

I am the President of Sossaman & Associates, which is one of the largest advertising agencies in Memphis, Tennessee. My agency has been in existence for 14 years. It is engaged in the business of helping clients plan their media strategies and in purchasing advertising time and space for clients in various types of media, including television broadcast stations, newspapers, radio stations, cable and outdoor advertising. Our focus varies with each client with some utilizing Memphis media, some utilizing regional media and some advertising nationally. On behalf of our clients, we have purchased advertising on television stations in Memphis, including WREG-TV, a station owned by the New York Times Company. I have personally been in the business of advertising and planning media strategies and buying media for advertising clients for over 25 years.

I've been asked to explain how, in my experience, advertisers determine the allocation of their advertising budget among different media, and particularly as it applies to television stations and newspaper.

My experience has shown the best way to achieve a client's objectives is to analyze each media and purchase advertising that will best reach the target audience for the least amount of dollars. When we establish a plan and ultimately purchase advertising in each medium, we judge television and newspaper on specific strengths and efficiencies of each. We consider the following:

designated market area. (DMA). This area will receive good penetration of the television signal and on cable systems. A central city newspaper may also reach many portions of the DMA, but there are also many competitive newspapers serving specific counties or cities in the DMA that compete directly with a central paper. A local Memphis store that only trades with Memphians will get less waste with the newspaper, but we must consider the target audience before eliminating TV. Similarly, a small business serving an outlying community or a candidate for office in a community comprising only a small portion of a DMA may do better with an outlying local newspaper or radio station. Each client's objectives will help us identify the best use of media dollars.

Cost Efficiency:

Cost efficiency can be calculated by dividing the cost of an advertising buy by the audience it reaches to obtain a cost per thousand (CPM) figure. This is the most accepted way of analyzing and comparing media. It is used more when comparing one TV station to another TV station than in comparing one medium to another. A newspaper CPM is somewhat deceiving, because a small ad has the same circulation as a large ad, but the cost differs greatly. That does not mean a larger ad should not be considered because it has a high CPM. The best CPM comparison for newspapers would be between two competing newspapers.

The advertising products being sold by the two different media are not the same and should be judged on the strengths of each. When an advertiser buys both newspaper and television advertising, this means

that it has been determined that both media are needed to reach the target audience of the advertiser. That combination would be enhanced by the use of combination packages that benefit both the media and the advertiser.

I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

Kenneth A. Sossaman

Date: 11/26/01

DECLARATION OF MAUREEN A. O'CONNOR

DECLARATION OF MAUREEN A. O'CONNOR

I am the General Sales Manager of television station WREG-TV, Memphis, Tennessee, which is owned by a subsidiary of The New York Times Company. I have held that position for three years. Prior to that, I had sixteen years of experience in newspaper advertising at The New York Times. There, I held a number of positions including Director of the Long Island Regional Office, Manager of Home Furnishings advertising, and sales representative in both the Long Island and Connecticut territories. I thus have extensive experience in selling advertising for both newspapers and television.

Newspapers and television stations each serve an advertiser's purposes in different ways. Television excels in image advertising, in showing products (automobiles, for example) in motion, and in speaking to the feelings of the specific, targeted, demographic audiences that watch specific television programs.

Newspapers offer more details – about grocery store specials, for example, or extensive price and model information for a local auto dealer, or about real estate offerings or employment opportunities. Department stores tend to advertise extensively in newspapers because they can display a wide range of products and a reader can have the pictures and prices of the products available from the ads for several days.

The larger advertisers tend to have distinct budgets for the different media – for television, for newspapers, for outdoor advertising, for radio, for cable, and also for indirect forms of promotions such as charitable contributions and public service

activities. While trade organizations (such as the Television Bureau of Advertising) attempt to promote the advantages of one medium over the other, individual television stations tend to compete primarily with each other in selling advertising. To the extent television stations try to compete directly with newspapers for advertising dollars that an advertiser has earmarked for print so as to reach different people or to deliver a message with different content, stations have not had much success. Our own focus in trying to create joint advertising offerings with newspapers has been to put together packages that will enable an advertiser to achieve different objectives with a single buy, and to focus on categories of business that neither a newspaper or a television station has been successful in developing individually, such as combined newspaper/television campaigns appealing to senior citizens or advertising an upcoming event.

I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge and belief.

Maureen A. O'Connor

//- 27-0/ (Date)